B.1.1

JAN 22 1986

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

ILD 000646.786

Ken Fredette
Vice President of Finance
Motor Oils Refining Company
7601 West 47th Street
McCook, Illinois 60525

Dear Mr. Fredette:

It has come to my attention that Motor Oils Refining Company has withdrawn its Resource Conservation and Recovery Act permit application submitted to the United States Environmental Protection Agency (U.S. EPA). A portion of such application was submitted to U.S. EPA with a confidentiality claim attached.

Pursuant to your request in our telephone conversation of January 21, 1986, I am returning to you that portion of the application which has been handled by U.S. EPA as confidential.

If you have any questions relating to this matter please contact me at 312/886-5323.

Sincerely,

BL

Bernard Landman
Assistant Regional Counsel

Enclosure

bcc: Augusta G. Bloom
Lily Herskovitz

MORECO Energy, Inc.
7601 W. 47TH STREET, McCOOK, ILLINOIS PHONE 312/242-2252

ILD 000 646786

December 11, 1984

Mr. Dave Dolan
U.S. E.P.A.

Mr. Eugene Theios
Illinois E.P.A.

RE: TELECONFERENCE DECEMBER 3, 1984

Gentlemen:

The following are the questions and answers which we discussed on December 3, 1984:

1) Are MORECO Energy, Inc.'s storage terminals exempt from Part A and Part B RCRA regulations for characteristic hazardous waste oils? Per federal regulations they are, due to the recycling exemption. However, if any of the facilities handled listed hazardous wastes, they must submit for closure and must meet all requirements under Part A and Part B of permitting. Partial closure for our facilities in Illinois will be handled through the Illinois Environmental Protection Agency.

2) Do wastes which are hazardous due to characteristics but exempt due to the recycling, still have to be manifested and show the hazardous classification on the manifest? Per current regulations, yes.

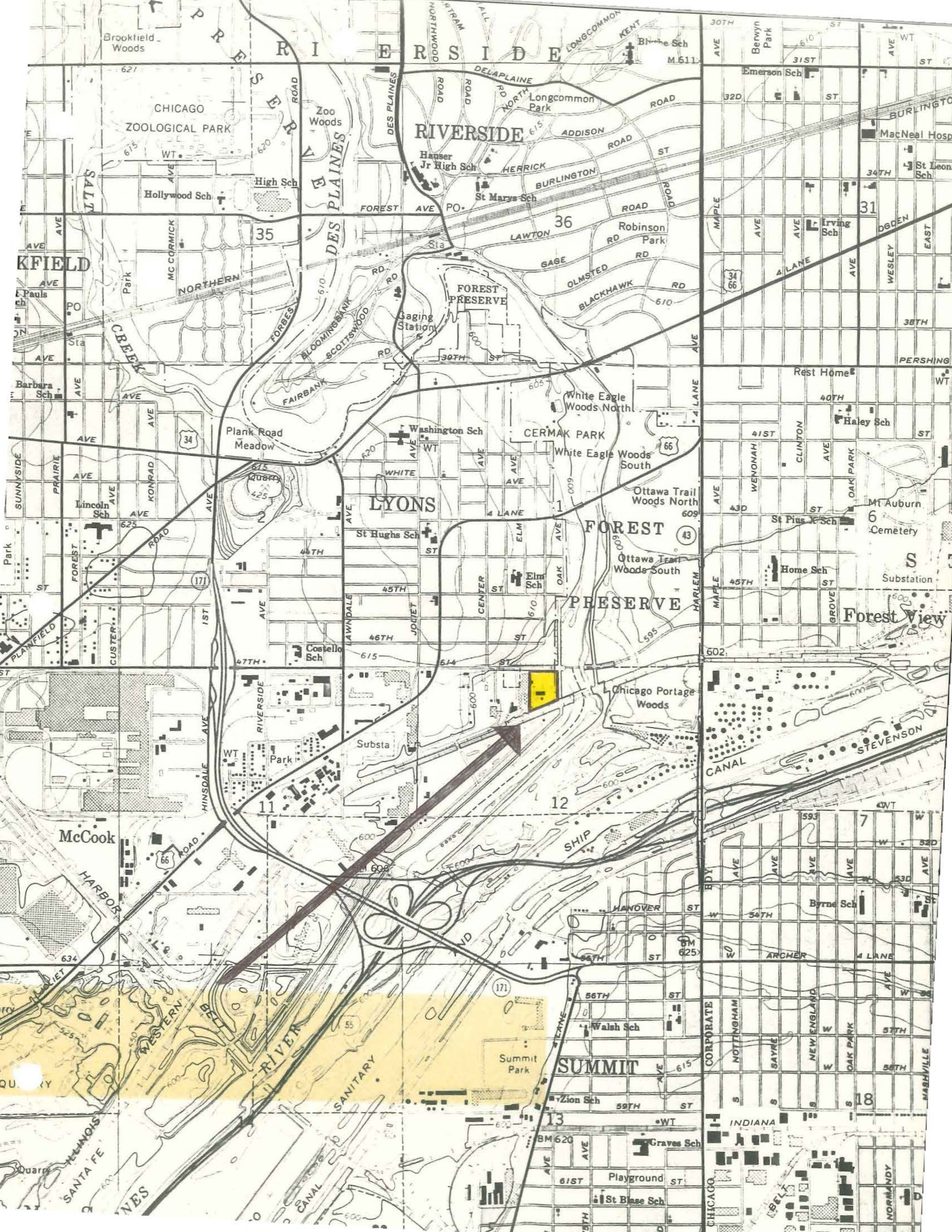
3) In the State of Illinois, if a waste is hazardous due to characteristics and being recycled, is it also exempt from the fee? Yes, if it is for a beneficial recovery.

I appreciate the time that both of you have given to clear up problem areas related to the interpretation of current EPA regulations.

Sincerely,

Kenneth L. Fredette
Vice President of Finance

KLF/dmg


RIVERSIDE
Brookfield Woods
CHICAGO ZOOLOGICAL PARK
Zoo Woods
DES PLAINES
RIVERSIDE
Hauser Jr High Sch
St Marys Sch
Hollywood Sch
High Sch
Longcommon Park
Robinson Park
Emerson Sch
MacNeal Hosp
Irving Sch
FOREST PRESERVE
Gaging Station
Plank Road Meadow
Washington Sch
CERMAK PARK
White Eagle Woods North
White Eagle Woods South
Ottawa Trail Woods North
Ottawa Trail Woods South
Rest Home
Haley Sch
LYONS
St Hughs Sch
Elm Sch
Costello Sch
Lincoln Sch
Barbara Sch
St Pauls
KFIELD
Quarry
FOREST PRESERVE
St Pius X Sch
Mt Auburn Cemetery
Home Sch
Substation
Forest View
Chicago Portage Woods
Substa
Park
McCook
CANAL
STEVENSON
SHIP
HANOVER
ARCHER
Byrne Sch
Walsh Sch
SUMMIT
Summit Park
Zion Sch
Graves Sch
Playground
St Blase Sch
SANITARY
RIVER
WESTERN
BELT
ILLINOIS
SANTA FE
HARBOR
SALT CREEK
NORTHERN
BURLINGTON
OGDEN
CORPORATE
CHICAGO
HARLEM
PERSHING
INDIANA
NASHVILLE

McCook

Motor Oils Refining Company

RECEIVED
NOV 05 1984
IEPA-DLPC

October 25, 1984

U.S. Environmental Protection Agency
Region V
230 South Dearborn Street
Chicago, IL 60604

Attn: Mr. Karl J. Klepitsch
Waste Management Branch

Subject: 5HW-13 Dunavan Oil (ILD 980794929) TRS, TSD, PA, 9
A A Waste Oil (ILD 000810291) TR S, TSD, PA, 9

Dear Mr. Klepitsch:

MORECO Energy, Inc. is the parent company which controls Motor Oils Refining Co. (a lube oil recycling plant in McCook, IL), and seven waste oil collection terminals in a five state area. Included in these seven collection terminals are Dunavan Oil Service (ILD 980794929) and A A Waste Oil (ILD 000810291) which are the subjects of two recent letters from your agency. (copies attached)

In February 1983, after Motor Oils Refining Co. had incurred considerable expense in the preparation and submission of documents required for the Part "B" permit, it was decided by the Agency that no such permit was required for the McCook facility. (copy of Agency letter February 27, 1983 attached) Each of the waste oil terminals mentioned collects used automotive crankcase oils and used industrial oils. Listed Hazardous wastes are not currently accepted. As with our McCook facility, we do however recognize that some of the used oils handled may exhibit the characteristics of hazardous wastes.

Upon reviewing the Agency's decision relative to our McCook facility we felt the same conditions applied to all of our Waste Oil terminals. That is, if listed hazardous wastes were not collected or stored at these facilities, then RCRA permits would not be required. To this end we submitted a letter to the Agency suggesting the withdrawal of these applications. (see Motor Oils letter of May 18, 1984 attached) In reply to our letter, we received two letters

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OCT 31 1984
WMD-RAIU
EPA-REGION V

7601 West 47th Street McCook, Illinois 60525
General Office Chicago (312) 242-2252 Suburban (312) 788-9017 Plant Chicago (312) 242-2306 Suburban (312) 442-8550

relating to A A Waste Oil and Dunavan Oil Service. Essentially these letters state that RCRA status must be maintained if the sites receive any "Listed Hazardous" or "Characteristic Hazardous" wastes. We understand this requirement for "Listed Hazardous" wastes. We have reviewed the waste stream authorizations for these facilities and have notified our personnel not to accept any listed hazardous wastes under any circumstances. We found also that the Dunavan site had a number of "suspect" materials accumulated under previous ownership. We are currently in the process of determining the composition of these materials so that they may be properly disposed of. A plan of closure is being prepared. Our intent is to close the facility as far as Listed Hazardous wastes are concerned.

At the A A Waste Oil Facility there are no Listed Hazardous wastes. Although not determined, there may be wastes which exhibit the characteristics of Hazardous wastes quite similar to those materials accepted at our McCook Facility. Again, our intent is to close this facility as far as Listed Hazardous wastes are concerned.

Per Mr. David Dolan of your Agency, current regulations would allow the acceptance of waste oils which exhibit the characteristics of hazardous wastes if those materials are being legitimately recycled or reclaimed. It is our understanding that once we have effected a formal closure of these facilities we will be able to continue to recieve waste oils for the purpose of recycling their lube components provided they do not contain listed hazardous wastes.

Please verify our interpretation.

Regards,

Mark W. Colchin

Mark W. Colchin
Operations Manager

MWC/dl

cc: J. P. O'Connell
EPA File

Motor Oils Refining Company

June 21, 1984

Mr. David Dolan
Waste Management Branch
U. S. ENVIRONMENTAL PROTECTION AGENCY
Region V
230 South Dearborn Street
Chicago, IL 60604

Dear Mr. Dolan:

Enclosed is the correspondence we discussed in our last telephone conversation. To date we have not received a reply on my March 5, 1984 letter to you.

I would also like to have someone at the Federal EPA level review our general permits from the Illinois EPA where they have said we do not need a Federal I.D. to handle it. I want all agency's in agreement.

Sincerely,

MOTOR OILS REFINING COMPANY

Kenneth L. Fredette
Vice President of Finance

KLF:kf

Enclosure

7601 West 47th Street McCook, Illinois 60525

General Office: Chicago (312) 242-2252 Suburban (312) 788-9017 Plant: Chicago (312) 242-2306 Suburban (312) 442-6166

Illinois Environmental Protection Agency 2200 Churchill Road, Springfield, IL 62706

217/782-6762

J.P. O'CONNELL

Refer to: 03117402 -- Cook County
McCook/Motor Oils Refining Co.

May 10, 1984

MAY 14 1984

Motor Oils Refining Co.
7601 West 47th Street
McCook, Illinois 60525

Attention: John P. O'Connell, President

Dear Mr. O'Connell:

This letter is to inform you that the Agency has revised your generic permit to reflect the changes discussed in the meeting between you and the Agency on April 25, 1984.

Very truly yours,

Lawrence W. Eastep, P.E., Manager
Permit Section
Division of Land Pollution Control

LWE:MKL:0912D/21

Enclosures

Illinois Environmental Protection Agency · 2200 Churchill Road, Springfield, IL 62706

217/782-6762

Refer to: 03117402 -- Cook County
McCook/Motor Oils Refining Co.
Permit No. 1980-2-OP
Supplemental Permit No. 1983-163-SP
Expiration Date: November 20, 1988

May 10, 1984

Motor Oils Refining Company
7601 West 47th Street
McCook, Illinois 60525

Attention: John P. O'Connell, President

Dear Mr. O'Connell:

Supplemental Permit, 1983-163-SP, is hereby granted to the above named waste management facility to allow acceptance for treatment and re-refining for lubricants only, the following used oils from any IEPA registered generator on a generic basis:

1. Diesel fuel
2. Railroad engine oils
3. Hydraulic fluids
4. Metal working fluids
5. Used oils inluding automotive crankcase drainings, waste industrial oils and gear lubricants
6. Automotive engine drainings (D008), minimum oil content 30% that contain lead.

all in accordance with the request and application received by the Agency on August 22 and September 29, 1983. This supplemental permit is subject to the standard conditions attached and is further subject to the following special conditions:

1. All wastes accepted under this generic waste stream permit shall be treated for beneficial recovery and reuse; no wastes may be received on a generic basis for blending and sale as supplemental fuels.

2. All wastes shall be transported from each generator to this treatment facility under a properly completed manifest.

3. Special wastes generated at the site for disposal, incinceration or further treatment elsewhere shall be transported to the receiving facility utilizing the Agency's supplemental permit system and manifest system.

4. All wastes accepted under this generic waste stream permit shall be appropriately treated (distillation, decanting, sedimentation, and filtration) with wastewater effluents discharged (under necessary permits) to the sanitary sewer and residuals transported to a permitted disposal site utilizing the Agency supplemental waste stream permit and manifest sytem.

5. An analysis of each waste stream accepted from each generator shall be maintained on file at your premises for review by the Agency.

6. A log must be maintained at the facility for any waste received that contains amounts of PCB's between 5-50 ppm. The following information must be recorded:

   A) generator name/address
   B) manifest/bill of lading number
   C) date received

7. This facility shall report to the Agency, on a quarter annual basis, the total quantity of each of the generic wastes shown in the attachments to this permit that were received for treatment. Quarter annual reports should be sent to:

   Compliance Monitoring Section
   Division of Land Pollution Control
   Illinois Environmental Protection Agency
   2200 Churchill Road
   Springfield, Illinois 62706

This schedule for submission of these waste receipt reports shall be within 30 days of the end of each quarter (i.e., reports due by 30th day of January, April, July and October).

Except as modified above, this site shall be operated in accordance with the terms and conditions of Permit No. 1980-2-OP, Supplemental Permit No. 1983-121-SP and Division of Air Pollution Control Permit I.D. No.: 031174AAE.

Very truly yours,

Lawrence W. Eastep, P.E., Manager
Permit Section
Division of Land Pollution Control

LWE:MKL:ds:0912D/22-23

Attachments

cc: File
Region
Compliance Monitoring Section

STANDARD CONDITIONS FOR CONSTRUCTION/DEVELOPMENT PERMITS
ISSUED BY THE ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

July 1, 1979

The Illinois Environmental Protection Act (Illinois Revised Statutes, Chapter 111-1/2, Section 1039) grants the Environmental Protection Agency authority to impose conditions on permits which it issues.

These standard conditions shall apply to all permits which the Agency issues for construction or development projects which require permits under the Divisions of Water Pollution Control, Air Pollution Control, Public Water Supplies, and Land and Noise Pollution Control. Special conditions may also be imposed by the separate divisions in addition to these standard conditions.

1. Unless this permit has been extended or it has been voided by a newly issued permit, this permit will expire one year after date of issuance unless construction or development on this project has started on or prior to that date.

2. The construction or development of facilities covered by this permit shall be done in compliance with applicable provisions of Federal laws and regulations, the Illinois Environmental Protection Act, and Rules and Regulations adopted by the Illinois Pollution Control Board.

3. There shall be no deviations from the approved plans and specifications unless a written request for modification of the project, along with plans and specifications as required, shall have been submitted to the Agency and a supplemental written permit issued.

4. The permittee shall allow any agent duly authorized by the Agency upon the presentation of credentials:

   a. to enter at reasonable times the permittee's premises where actual or potential effluent, emission or noise sources are located or where any activity is to be conducted pursuant to this permit.

   b. to have access to and copy at reasonable times any records required to be kept under the terms and conditions of this permit.

   c. to inspect at reasonable times, including during any hours of operation of equipment constructed or operated under this permit, such equipment or monitoring methodology or equipment required to be kept, used, operated, calibrated and maintained under this permit.

d. to obtain and remove at reasonable times samples of any dischasge or emission of pollutants.

e. to enter at reasonable times and utilize any photographic, recording, testing, monitoring or other equipment for the purpose of preserving, testing, monitoring, or recording any activity, discharge, or emission authorized by this permit.

5. The issuance of this permit:

a. shall not be considered as in any manner affecting the title of the premises upon which the permitted facilities are to be located;

b. does not release the permittee from any liability for damage to person or property caused by or resulting from the construction, maintenance, or operation of the proposed facilities;

c. does not release the permittee from compliance with other applicable statutes and regulations of the United States, of the State of Illinois, or with applicable local laws, ordinances and regulations;

d. does not take into consideration or attest to the structural stability of any units or parts of the project;

e. in no manner implies or suggests that the Agency (or its officers, agents or employees) assumes any liability, directly or indirectly, for any loss due to damage, installation, maintenance, or operation of the proposed equipment or facility.

6. Unless a joint construction/operation permit has been issued, a permit for operating shall be obtained from the Agency before the facility or equipment covered by this permit is placed into operation.

7. These standard conditions shall prevail unless modified by special conditions.

8. The Agency may file a complaint with the Board for modification, suspension or revocation of a permit:

a. upon discovery that the permit application contained misrepresentations, misinformation or false statements or that all relevant facts were not disclosed; or

b. upon finding that any standard or special conditions have been violated; or

c. upon any violation of the Environmental Protection Act or any Rule or Regulation effective thereunder as a result of the construction or development authorized by this permit.

Illinois Environmental Protection Agency · 2200 Churchill Road, Springfield, IL 62706

GENERIC WASTE STREAM PERMIT ATTACHMENT

SITE CODE: 03117402 GENERIC W/S PERMIT NUMBER: 000044

SITE NAME: J P O'CONNELL SUP/OP PERMIT NUMBER: 1983163SP

DATE RECEIVED: 08/22/83 DATE APPROVED: 11/14/83

GENERIC WASTE CODE: 0023

GENERIC WASTE NAME: WASTE DIESEL FUEL

WASTE CLASSIFICATION: NON-HAZARDOUS NOT SUBJECT TO FEE

IEPA NON-HAZARD WASTE NUMBER(S): 0002

TREATMENT CODE(S): D20,S02,T38,T40,T49,T54

FLASH POINT (MIN): 140F PH (MIN): 2.0 PH (MAX): 12.5

---------- MAJOR WASTE COMPONENTS ----------

CODE	NAME	MAX LIMITS
0116	BOTTOM SEDIMENTS AND WATER	030 % VOL
0009	OTHER HALOGENATED SOLVENTS	005 % VOL
0024	ARSENIC	005 PPM
0036	BARIUM	100 PPM
0025	CADMIUM	001 PPM
0031	CHROMIUM	500 PPM
0030	LEAD	100 PPM
0028	SELENIUM	001 PPM
0034	SILVER	005 PPM
0117	PCB	005 PPM
0118	PESTICIDE	010 PPM
0035	ZINC	010 PPM
0048	IRON	050 PPM
0033	NICKEL	005 PPM
0119	MANGANESE	005 PPM

DISPOSAL METHOD: WASTE USE,REUSE OR RECLAMATION

MKL

Illinois Environmental Protection Agency · 2200 Churchill Road, Springfield, IL 62706

GENERIC WASTE STREAM PERMIT ATTACHMENT

SITE CODE: [illegible]3117402

GENERIC W/S PERMIT NUMBER: 000045

SITE NAME: J [illegible] MCCONNELL

GEN/SP PERMIT NUMBER: 1983105[illegible]

DATE RECEIVED: 09/22/83

DATE APPROVED: 11/14/83

GENERIC WASTE CODE: 0024

GENERIC WASTE NAME: WASTE RAILROAD ENGINE OILS

WASTE CLASSIFICATION: NON-HAZARDOUS NOT SUBJECT TO FEE

IEPA GENERAL WASTE NUMBER(S): 0002

TREATMENT CODE(S): D2[illegible],[illegible]0E,T5[illegible],T49,T48,T5[illegible]

FLASH POINT (MIN): 140F PH (MIN): 2. PH (MAX): 12.[illegible]

------------ MAJOR WASTE COMPONENTS ------------

CODE	NAME	MAX LIMITS
0118	BOTTOM SEDIMENTS AND WATER	099 % VOL
0009	OTHER HALOGENATED SOLVENTS	005 % VOL
0024	ARSENIC	005 PPM
0030	BARIUM	100 PPM
0025	CADMIUM	001 PPM
0031	CHROMIUM	500 PPM
0033	LEAD	100 PPM
0026	SELENIUM	001 PPM
0034	SILVER	005 PPM
0117	PCB	005 PPM
011[illegible]	[illegible]	[illegible] PPM
0035	[illegible]	1[illegible]0 PPM
004[illegible]	[illegible]	2[illegible] PPM
003[illegible]	NICKEL	020 PPM
011[illegible]	MANGANESE	030 PPM

DISPOSAL METHOD: WASTE USE,REUSE OR RECLAMATION

AKL

Illinois Environmental Protection Agency · 2200 Churchill Road, Springfield, IL 62706

GENERIC WASTE STREAM PERMIT ATTACHMENT

SITE CODE: 03117402

GENERIC W/S PERMIT NUMBER: 000046

SITE NAME: J P O'CONNELL

SUP/OP PERMIT NUMBER: 1983163SP

DATE RECEIVED: 08/22/83

DATE APPROVED: 11/14/83

GENERIC WASTE CODE: 0025

GENERIC WASTE NAME: WASTE METAL WORKING FLUIDS

WASTE CLASSIFICATION: NON-HAZARDOUS NOT SUBJECT TO FEE

IEPA NON-HAZARD WASTE NUMBER(S): 0002

TREATMENT CODE(S): D20,S02,T38,T40,T44,T54

FLASH POINT (MIN): 140F PH (MIN): 2.0 PH (MAX): 12.5

---------- MAJOR WASTE COMPONENTS ----------

CODE	NAME	MAX LIMITS
0116	BOTTOM SEDIMENTS AND WATER	099 % VOL
0009	OTHER HALOGENATED SOLVENTS	005 % VOL
0024	ARSENIC	005 PPM
0036	BARIUM	005 PPT
0025	CADMIUM	001 PPM
0031	CHROMIUM	500 PPM
0030	LEAD	500 PPM
0026	SELENIUM	001 PPM
0034	SILVER	005 PPM
0117	PCB	005 PPM
0118	PESTICIDE	010 PPM
0035	ZINC	001 PPT
0048	IRON	002 PPT
0119	MANGANESE	200 PPM
0033	NICKEL	200 PPM

DISPOSAL METHOD: WASTE USE,REUSE OR RECLAMATION

MKL

Illinois Environmental Protection Agency · 2200 Churchill Road, Springfield, IL 62706

GENERIC WASTE STREAM PERMIT ATTACHMENT

SITE CODE: 03117402 GENERIC W/S PERMIT NUMBER: 000047

SITE NAME: J P [illegible]CONNELL SUP/OP PERMIT NUMBER: [illegible]

DATE RECEIVED: [illegible]/22/83 DATE APPROVED: 11/1[illegible]/83

GENERIC WASTE CODE: 0026

GENERIC WASTE NAME: WASTE AUTOMOTIVE CRANKCASE OILS

WASTE CLASSIFICATION: NON-HAZARDOUS NOT SUBJECT TO FEE

IEPA NON-HAZARDOUS WASTE NUMBER(S): 0502

TREATMENT CODE(S): D20,R02,T35,T4[illegible],T48,T50

FLASH POINT (MIN): 140F PH (MIN): 2.[illegible] PH (MAX): 12.5

------------ MAJOR WASTE COMPONENTS ------------

CODE	NAME	MAX LIMITS
[illegible]115	BOTTOM SEDIMENT AND WATER	05% [illegible] VOL
[illegible]	OTHER HALOGENATED SOLVENTS	005 % VOL
[illegible]024	ARSENIC	005 PPM
[illegible]036	BARIUM	500 PPM
[illegible]025	CADMIUM	001 PPM
[illegible]031	CHROMIUM	[illegible] PPM
[illegible]032	LEAD	005 PPM
[illegible]028	SELENIUM	001 PPM
[illegible]034	SILVER	005 PPM
[illegible]117	PCB	005 PPM
[illegible]	PESTICIDES	[illegible] PPM
[illegible]035	ZINC	002 PPM
[illegible]	IRON	50[illegible] PPM
[illegible]119	MANGANESE	050 PPM
[illegible]033	NICKEL	020 PPM

DISPOSAL METHOD: WASTE USE,REUSE OR RECLAMATION

[illegible]L

Illinois Environmental Protection Agency · 2200 Churchill Road, Springfield, IL 62706

GENERIC WASTE STREAM PERMIT ATTACHMENT

SITE CODE: [illegible]3117402

GENERIC W/S PERMIT NUMBER: [illegible]

SITE NAME: T P MCDOWELL

SUP/OP PERMIT NUMBER: 198314[illegible]

DATE RECEIVED: [illegible]/22/83

DATE APPROVED: 11/14/83

GENERIC WASTE CODE: 0025

GENERIC WASTE NAME: WASTE AUTOMOTIVE CRANKCASE OILS

WASTE CLASSIFICATION: HAZARDOUS SUBJECT TO FEE

USEPA HAZARDOUS WASTE NUMBER(S): [illegible]

TREATMENT CODE(S): [illegible],[illegible]2,T3[illegible],T[illegible],T44,T50

FLASH POINT (F): [illegible]

PH (S.U.): N/A

PH ([illegible]): N/A

------------ WASTE COMPONENTS ------------

CODE	NAME	MAX LIMITS
0116	BOTTOM SEDIMENTS AND WATER	099 % VOL
0009	OTHER HALOGENATED SOLVENTS	005 % VOL
0024	ARSENIC	005 PPM
0036	BARIUM	500 PPM
0025	CADMIUM	001 PPM
0031	CHROMIUM	500 PPM
0030	LEAD	005 PPM
0026	SELENIUM	001 PPM
0034	SILVER	005 PPM
0117	PCB	005 PPM
011[illegible]	PESTICIDE	01[illegible] PPM
0035	ZINC	002 PPM
004[illegible]	IRON	500 PPM
0033	NICKEL	050 PPM
011[illegible]	MANGANESE	[illegible]20 PPM

DISPOSAL METHOD: WASTE USE,REUSE OR RECLAMATION

MKL

Illinois Environmental Protection Agency · 2200 Churchill Road, Springfield, IL 62706

GENERIC WASTE STREAM PERMIT ATTACHMENT

SITE CODE: 03117402 GENERIC W/S PERMIT NUMBER: 000049

SITE NAME: J P O'CONNELL SUP/OP PERMIT NUMBER: 1983163SP

DATE RECEIVED: 08/22/83 DATE APPROVED: 11/14/83

GENERIC WASTE CODE: 0027

GENERIC WASTE NAME: WASTE INDUSTRIAL OILS

WASTE CLASSIFICATION: NON-HAZARDOUS NOT SUBJECT TO FEE

IEPA NON-HAZARD WASTE NUMBER(S): 0002

TREATMENT CODE(S): D20,S02,T38,T40,T44,T54

FLASH POINT (MIN): 140F PH (MIN): 2.0 PH (MAX): 12.5

---------- MAJOR WASTE COMPONENTS ----------

CODE	NAME	MAX LIMITS
0116	BOTTOM SEDIMENTS AND WATER	099 % VOL
0009	OTHER HALOGENATED SOLVENTS	005 % VOL
0024	ARSENIC	005 PPM
0036	BARIUM	100 PPM
0025	CADMIUM	001 PPM
0031	CHROMIUM	500 PPM
0030	LEAD	005 PPT
0026	SELENIUM	001 PPM
0034	SILVER	005 PPM
0117	PCB	005 PPM
0118	PESTICIDE	010 PPM
0035	ZINC	002 PPT
0048	IRON	002 PPT
0119	MANGANESE	200 PPM
0033	NICKEL	200 PPM

DISPOSAL METHOD: WASTE USE,REUSE OR RECLAMATION

MKL

Illinois Environmental Protection Agency · 2200 Churchill Road, Springfield, IL 62706

GENERIC WASTE STREAM PERMIT ATTACHMENT

SITE CODE: 05117862

GENERIC W/S PERMIT NUMBER: 000050

SITE NAME: J P O'CONNELL

SUPP/SP PERMIT NUMBER: 19831633

DATE RECEIVED: 05/22/83

DATE APPROVED: 11/15/83

GENERIC WASTE CODE: 0028

GENERIC WASTE NAME: WASTE HYDRAULIC FLUIDS

WASTE CLASSIFICATION: NON-HAZARDOUS NOT SUBJECT TO FEE

IEPA NON-HAZ. WASTE NUMBER(S): NONE

TREAT & D CODE(S): D20,R02,T39,T40,T46,T50

FLASH POINT (F): 140F PH (L): 2.0 PH (H): 12.0

------------- MAXIMUM WASTE COMPONENTS -------------

CODE	NAME	MAX LIMITS
0116	BOTTOM SEDIMENTS AND WATER	050 % VOL
0076	OTHER HALOGENATED SOLVENTS	005 % VOL
0024	ARSENIC	005 PPM
0036	BARIUM	400 PPM
0023	CADMIUM	001 PPM
0031	CHROMIUM	500 PPM
0034	LEAD	100 PPM
0026	SELENIUM	001 PPM
0034	SILVER	005 PPM
0117	PCB	015 PPM
0118	PESTICIDE	010 PPM
0035	ZINC	020 PPM
0081	IRON	500 PPM
0114	MANGANESE	040 PPM
0055	NICKEL	022 PPM

DISPOSAL STATUS: WASTE USE, REUSE OR RECLAMATION

MKL

Illinois Environmental Protection Agency · 2200 Churchill Road, Springfield, IL 62706

GENERIC WASTE STREAM PERMIT ATTACHMENT

SITE CODE: 03117402 GENERIC W/S PERMIT NUMBER: 000051

SITE NAME: J P O'CONNELL SUP/OP PERMIT NUMBER: 19831635P

DATE RECEIVED: 08/22/83 DATE APPROVED: 11/14/83

GENERIC WASTE CODE: 0029

GENERIC WASTE NAME: WASTE GEAR LUBRICANTS

WASTE CLASSIFICATION: NON-HAZARDOUS NOT SUBJECT TO FEE

IEPA NON-HAZARD WASTE NUMBER(S): 0002

TREATMENT CODE(S): D20,S02,T38,T40,T44,T54

FLASH POINT (MIN): 140F PH (MIN): 2.0 PH (MAX): 12.5

---------- MAJOR WASTE COMPONENTS ----------

CODE	NAME	MAX LIMITS
0116	BOTTOM SEDIMENTS AND WATER	020 % VOL
0009	OTHER HALOGENATED SOLVENTS	005 % VOL
0024	ARSENIC	005 PPM
0036	BARIUM	001 PPT
0025	CADMIUM	001 PPM
0031	CHROMIUM	500 PPM
0030	LEAD	001 % VOL
0028	SELENIUM	001 PPM
0034	SILVER	005 PPM
0117	PCB	005 PPM
0118	PESTICIDE	010 PPM
0035	ZINC	001 PPT
0046	IRON	002 PPT
0119	MANGANESE	200 PPM
0033	NICKEL	200 PPM

DISPOSAL METHOD: WASTE USE,REUSE OR RECLAMATION

MKL

FEB 27 1984

5HW-12

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

John P. O'Connell, President
Motor Oils Refining Company
7601 West 47th Street
McCook, Illinois 60525

Dear Mr. O'Connell:

Based upon the information contained in your company's submission of a revised Part A, and conversations with Mr. Kenneth Fredette, it has been determined that your facility is not governed under current Agency regulations. Consequently, your facility does not have interim status. We have, therefore, terminated processing of your Part B permit application.

Should the Agency promulgate regulations for the wastes your facility now treats, your company could qualify for interim status as an existing hazardous waste management facility by submitting Part A of the permit application in accordance with 40 CFR 270.10(e). In no event will your facility be able to treat currently listed hazardous wastes without prior submission of a Part B permit application, as a new facility, and the issuance of a RCRA permit. Furthermore, be advised that you must still comply with any applicable state and local requirements.

You may contact Mr. David Dolan of my staff at 886-1484, if you have further questions on this matter.

Sincerely,

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

cc: Kenneth Fredette
C.T. Corporation System
Larry Eastep, IEPA

bcc: William Radlinski, IEPA
Marla Laymon, IEPA
Ken Becheley, IEPA

5HW:D.DOLAN:ad 2/23/84 Disk #4

	TYPIST	AUTHOR	FU #2 CHIEF	SFU #3 CHIEF	TPS CHIEF	WMB CHIEF	WMD DIRECTOR
INITIALS	N.S. 2/24/84 a.D.	DJD				2/24/84 KJK	
DATE	2-23-84	2/24/84			2/24/84	2/24/84	

5HW-12

JAN 1 0 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Lawrence Eastep, Manager
Permits Section, DLPC
Illinois EPA
2200 Churchill Road
Springfield, Illinois 62706

Re: Part B Permit application
Motor Oils Refining Company
ILD 000646786

Dear Mr. Eastep:

I am transferring additional information for the above referenced Part B application. Please contact Mr. David Dolan, at (312) 886-0994, if you have questions regarding this matter.

Sincerely,

William H. Miner, Chief
Technical, Permits, and Compliance Section

Enclosure: Copy 3, Dated 12/30/83

cc: Ken Bechely
William Radlinski, IEPA

bcc: L. Marrable, VERSAR
C.L. Lewis, GMCU
D. Dolan

5HW:D.Dolan:ad 1/9/84 Disk #X

P 611 630 680

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL

(See Reverse) HW-13

Sent to J. P. O'Connell, President Motor Oils Refining Co.	
Street and No. 7601 West 47th Street	
P.O., State and ZIP Code McCook, Illinois 60525	
Postage	$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to whom and Date Delivered	
Return receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	$
Postmark or Date	

PS Form 3800, Feb. 1982 ★ U.S.G.P.O. 1983-403-517

PS Form 3811, July 1982

● **SENDER:** Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
   - ☐ Show to whom and date delivered ..... ____¢
   - ☐ Show to whom, date, and address of delivery .. ____¢
2. ☐ RESTRICTED DELIVERY..... ____¢
   (The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL $____

3. ARTICLE ADDRESSED TO: J. P. O'Connell, President
Motor Oils Refining Company
7601 West 47th Street
McCook, IL 60525

4. TYPE OF SERVICE:
   - ☐ REGISTERED ☐ INSURED
   - ☐ CERTIFIED ☐ COD
   - ☐ EXPRESS MAIL

ARTICLE NUMBER: P 611 630 680

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☑ Authorized agent

5. DATE OF DELIVERY: 3/11/84

POSTMARK (may be on reverse side)

6. ADDRESSEE'S ADDRESS *(Only if requested)*

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS: EM

RETURN RECEIPT

☆ GPO: 1982-379-593

Motor Oils Refining Company

Mr. William H. Miner, Chief
Technical, Permits and Compliance Section
U. S. Environmental Protection Agency, Region V
230 South Dearborn Street
Chicago, IL 60604

Dear Mr. Miner:

Our contracted engineering firm recently completed the large scale topographic map for this facility. Four copies are enclosed which should complete our Part B Application.

We also noticed erroneous references to other parts of the application on pages 30 and 45. Corrected pages are included.

As in the past, we remain ready to address any further questions you may have regarding the application.

Yours truly,

John P. O'Connell
President

COPY 2

7601 West 47th Street McCook, Illinois 60525
General Office: Chicago (312) 242-2252 Suburban (312) 788-9017 Plant: Chicago (312) 242-2306 Suburban (312) 442-6166

Motor Oils Refining Company

Mr. William H. Miner, Chief
Technical, Permits and Compliance Section
U. S. Environmental Protection Agency, Region V
230 South Dearborn Street
Chicago, IL 60604

Dear Mr. Miner:

Motor Oils Refining Company has addressed the deficiencies to its Part B Application stated in your notice dated 27 July 1983. As a result we are submitting revisions to sections of the original application, in quadruplicate.

One item, a topographic map of the plant site, has not been completed by our contracted engineering firm. As soon as it is completed it will be forwarded to you as a page to insert in the application.

Attached you will find a brief summary of the revisions made to our application and four sets of revisions complete with instructions for posting.

We believe that our revised Part B Application adequately addresses the items contained in your notice. We remain ready to address any further questions you may have regarding the application.

John P. O'Connell
President

7601 West 47th Street McCook, Illinois 60525
General Office: Chicago (312) 242-2252 Suburban (312) 788-9017 Plant: Chicago (312) 242-2306 Suburban (312) 442-6166

SUMMARY OF DEFICIENCY CORRECTIONS

The following is a synopsis of corrections made as indicated in your Notice of Deficiencies, Attachment A. We have attempted to identify the type of correction and indicate where the correction will be found in revised or inserted pages in the Part B Application.

1. Facility Description (B-1, 3)

   The incinerator is not a hazardous waste incinerator. It operates similar to a flare in that it burns the plant's cracked waste gases, which are byproducts of the main operations. It does have a state operating permit. This is addressed on the revised page 15.

2. Topographic Maps (B-2)

   A Plot Plan detailing buildings, sewers, fire control facilities, drainage barriers and run off control systems is included on inserted page 15.20. The topographic map of the plant site is not complete. It will be forwarded to you in September and it will be inserted page 16.10.

3. Floodplain Standard

   The complete map, including documentation that it is a 100 year floodmap, is on inserted page 18.10. Also the levee that is of concern to the plant is indicated on the floodmap.

4. Waste Analysis Plan (C-2a, 2d)

   This is addressed on revised page 26. The term "infrequently" has been changed to annually.

5. Traffic Information (B-4)

   The volume of traffic, the road's load-bearing capacity, the access road surfacing have all been added to revised page 19.

6. Containers (D-1)

   The procedure for unloading oil in containers is described in more detail. Also, included on revised page 30 and 31 is a detailed description of the 60'x15' concrete slab where the drums are emptied and consequently stored. This slab has a curb to prevent both run-on and run off with run off accumulated in the collection sump.

7. Tank Description (D-2)

The storage tanks are atmospheric pressure and there are no pressure controls on the tank (other than the vent). This is addressed on revised page 33. Information on corrosion and the details of the feed system are addressed on inserted page 33.10.

8. Security procedures and Equipment (F-1)

The traffic control procedures for arrivals and departures, and security procedures that plant employees follow are addressed on revised page 39.

9. General Inspection Schedule (F-2a)

The safety, emergency and process equipment inspectors, plus the list of process equipment is added on revised page 40. Inserted page 40.10 describes the items to be inspected on each item of safety and emergency equipment.

10. Tank Inspection (F-2B)

There are no pressure and temperature gauges on the storage tanks. Overfilling is prevented by Shift Supervisor and the Operator checking first for adequate volume before unloading. This is addressed on revised page 43 along with procedures for tank interior inspection.

11. Preparedness and Prevention Requirements (F-3)

The applicant does not wish to request a waiver of the preparedness and prevention requirements. This is stated on inserted page 44.10.

12. Preventive Procedures, Structures, and Equipment (F-4)

The procedures followed for accidental spills along with a more detailed description of the improvised dike area is addressed on revised page 45 F-4a. Also included on that page are areas where the plant is paved (F-4c) and a statement that the plant's protection equipment meets OSHA requirements (F-4e).

13. Contingency Plan (G-1)

The dikes, sump pumps, drainage system and other spill control devices are high-lighted on the Plot Plan drawing (page 15.10). Copies of the emergency reports will be located in the plant operations office as stated on revised page 52.

14. Closure Plans, Post-Closure Plans and Financial Requirements

A more detailed closure plan is addressed on revised page 79. A Financial Report is included on inserted page 81.01 thru 81.15.

ILD 006468669

PS Form 3811, Dec. 1980

● **SENDER:** Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
   - ☒ Show to whom and date delivered ..... ¢
   - ☐ Show to whom, date, and address of delivery .. ¢
2. ☐ **RESTRICTED DELIVERY** ¢
   (The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL $

3. **ARTICLE ADDRESSED TO:**
John P. O'Connell, President
Motor Oil Refining Company
7601 West 47th Street
McCook, Illinois 60525

4. **TYPE OF SERVICE:**
   - ☒ REGISTERED ☐ INSURED
   - ☐ CERTIFIED ☐ COD
   - ☐ EXPRESS MAIL

ARTICLE NUMBER
468308

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☒ Authorized agent

J C Olszewski MOTOR OIL

5. **DATE OF DELIVERY** 7/29/83

POSTMARK JUL 29 1983

6. **ADDRESSEE'S ADDRESS** *(Only if requested)*

7. **UNABLE TO DELIVER BECAUSE:**

7a. **EMPLOYEE'S INITIALS** JS

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

No. 468308

RECEIPT FOR CERTIFIED MAIL
NO INSURANCE COVERAGE PROVIDED—NOT FOR INTERNATIONAL MAIL
(See Reverse) JW

SENT TO: Mr. John P. O'Connell
STREET AND NO.: Motor Oil Refining
7601 West 47th Street
P.O., STATE AND ZIP CODE:
McCook, Illinois 60525

POSTAGE	$
CERTIFIED FEE	¢
SPECIAL DELIVERY	¢
RESTRICTED DELIVERY	¢
OPTIONAL SERVICES — RETURN RECEIPT SERVICE — SHOW TO WHOM AND DATE DELIVERED	¢
SHOW TO WHOM, DATE, AND ADDRESS OF DELIVERY	¢
SHOW TO WHOM AND DATE DELIVERED WITH RESTRICTED DELIVERY	¢
SHOW TO WHOM, DATE AND ADDRESS OF DELIVERY WITH RESTRICTED DELIVERY	¢
TOTAL POSTAGE AND FEES	$
POSTMARK OR DATE	

CONSULT POSTMASTER FOR FEES

3 Form 3800, Apr. 1976

Motor Oil Refining Company
ILD 006468669

CHICAGO, IL LOOP STA. JUL 28 1983 USPO

UNITED STATES POSTAL SERVICE
OFFICIAL BUSINESS

SENDER INSTRUCTIONS

Print your name, address, and ZIP Code in the space below.

- Complete items 1, 2, 3, and 4 on the reverse.
- Attach to front of article if space permits, otherwise affix to back of article.
- Endorse article "Return Receipt Requested" adjacent to number.

PENALTY FOR PRIVATE USE TO AVOID PAYMENT OF POSTAGE, $300

U.S.MAIL

RETURN TO

(Name of Sender)

E. Ardiente

5HW-13
U.S. Environmental Protection Agency
Region V
230 South Dearborn
Chicago, Illinois 60604

5HW

JUL 27 1983

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

IL D000 646 786

Mr. John P. O'Connell
President
Motor Oil Refining Company
7601 West 47th Street
McCook, Illinois 60525

Re: NOTICE OF DEFICIENCY
Motor Oil Refining Company
~~ILD 006468669~~

Dear Mr. O'Connell:

Pursuant to Section 3005 of the Resource Conservation and Recovery Act (RCRA), as amended and Code of Federal Regulations 40 CFR 270.10, 270.51, and 124.3, the United States Environmental Protection Agency (U.S. EPA) has completed an initial review of your Part B application for a RCRA permit to treat and store hazardous waste. The purpose of this initial review is to check for completeness of your permit application against a list of required information delineated in 40 CFR Section 270.14 and 270.15. Please note that effective April 1, 1983, 40 CFR Part 122 of the Consolidated Permit Regulations pertaining to RCRA has been recodified as 40 CFR Part 270 and 40 CFR Part 123 has been recodified as 40 CFR 271. 40 CFR Part 124 remains applicable but has been modified to revise the cross-references to former Parts 122 and 123. A copy of the April 1, 1983, Federal Register is attached for your reference.

As a result of this review, we found that your application is incomplete because it is deficient in several areas, as described in Attachment A. You will be notified that the application is complete after you have corrected these deficient areas. The due date for the submittal of such information is August 24, 1983. However, you are encouraged to submit this information at your earliest convenience, to enable us to expedite our technical review process.

Our Agency intends to work cooperatively with the Illinois Environmental Protection Agency (IEPA) in processing your permit application. Should the Illinois hazardous waste program become authorized to permit treatment and storage facilities during the permit processing period, the IEPA in lieu of U.S. EPA will make the final determination on your application.

Again we are committed to conduct the RCRA permitting process as promptly and as efficiently as possible. Please feel free to contact Mrs. Edith M. Ardiente of my staff at (312) 886-7457, if you have any questions regarding this review.

Sincerely,

William H. Miner, Chief
Technical, Permits and Compliance Section

Enclosures

cc: Larry Eastep
Illinois EPA

5HW:EDITH M. ARDIENTE:ad 7/21/83 Disk #2

INITIALS	TYPIST	AUTHOR				
DATE	7-25-83	7/24/83	7/26/83	7/27/83	CHIEF	DIRECTOR

Attachment A

Deficiencies in Motor Oil Refining Company's (ILD 000646786) Part B Application

Due: August 24, 1983

1. Facility Description (B-1,3)

Is the incinerator a hazardous waste incinerator? What materials are disposed of in this incinerator. Does it have state or local operating permits?

2. Topographic Maps (B-2)

Please provide the following information:

a. The map scale, date and wind rose. Scale should be no more than 1 inch equals 200 feet.
b. The location of the hazardous waste operation unit.
c. The location of other buildings, sewers, fire control facilities, drainage barriers and runoff control systems.
d. Which sections of the map are industrial? Which residential?

3. Floodplain Standard (B-3b)

a. Please show the levees on the map.
b. A document showing that the levee is a 100 year flood levee.
c. A document showing that the floodmap enclosed is a 100 year floodmap.

4. Waste analysis Plan (C-2a, 2d)

Indicate the time frame associated with the term "infrequently"; i.e. weekly, monthly or annually?

5. Traffic Information (B-4)

Provide information on estimated volume of traffic, the road's load-bearing capacity, the traffic control signals and the access road surfacing, within the facility.

6. Containers (D-1)

Please describe in greater detail the primary drum unloading facility procedures and where it is located on the site. Please include information on system capacity and control of run-on.

7. Tank Description (D-2)

Please provide the following:

a. Information on the tank's internal pressure and any pressure controls.
b. Information on the corrosion effect of the tank walls.
c. A description of the feed systems, safety cut-off and by-pass systems.

8. Security Procedures and Equipment (F-1)

   a. What are the traffic control procedures for arrivals or departures at the facility during working hours? During closing hours?

   b. What are the procedures that an employee follows while on security duty? (Walk the property perimeter, check doors, etc.)

9. General Inspection Schedule (F-2A)

   a. Who inspects the safety, emergency and process equipment?
   b. Please list what process equipment is checked (example: flow monitors, gas detectors, spill control, etc.)?
   c. On page 40, how frequent is continuous?
   d. Identification of the types of problems to be inspected (F2A(1)).

10. Tank Inspection (F-2B)

   a. Please provide information about the overfilling control equipment and pressure or temperature gauges.
   b. Please provide procedures for inspection of tank interior.

11. Preparedness and Prevention Requirements (F-4)

   Please address this section.

12. Preventive Procedures, Structures, and Equipment (F-4)

   a. Please describe the improvised dike area.
   b. Please outline the procedures for accidental spills.
   c. Please describe where the plant is diked and where it is paved (F-4c).
   d. Is the personal protection equipment OSHA approved?

13. Contingency Plan (G-1)

   a. Please show where the dikes, sump pumps, drainage system and other spill control devices are located on the site.
   b. Where will copies of the emergency reports be located?

14. Closure Plans, Post-Closure Plans and Financial Requirements

   a. Please provide a detailed closure plan.
   b. Please file one of the following documents:

      Financial Report
      Letter of Credit
      Stand By Trust Fund
      Surety Bond

GRH for EA 7/26/83

JGW 7/26/83

7/27

Illinois Environmental Protection Agency · 2200 Churchill Road, Springfield, IL 62706

217/782-3983

REFER TO: 03117402-Cook
McCook-Motor Oil Refining
USEPA ILD 000646786

July 13, 1983

Received
7/14/83
9:00 am

William H. Miner, Chief
Technical, Permit, and Compliance Section
United States Environmental Protection Agency
Region V
230 South Dearborn Street
Chicago, Illinois 60604

Attention: 5HW

Dear Mr. Miner:

Please find enclosed a list of the deficiencies we have identified in the above facility's hazardous waste Part B application, and a copy of the completeness checklist.

If you have any questions regarding this application, please contact Marla Laymon at 217/782-3983.

Sincerely,

Eugene P. Theios/klc

Eugene P. Theios, Manager
Disposal Alternatives Unit
Permit Section
Division of Land Pollution Control

EPT:MKL:tb7467c/23

cc: Northern Region
Division File

140-5

Illinois Environmental Protection Agency · 2200 Churchill Road, Springfield, IL 62706

Refer to: 03117402 -- Cook County
McCook -- Motor Oils Refining Co.
USEPA ILD 000646786

List of Deficiencies

1. Topographic Maps (B-2)

Please provide the following information:

a. The map scale, date and wind rose.
b. The location of the hazardous waste operation unit.
c. The location of other buildings, sewers, fire control facilities, drainage barriers and runoff control systems.
d. Which sections of the map are industrial? Which residential?

2. Floodplain Standard (B-36)

a. Please show the levees on the map.
b. A document showing that the levee is a 100 year flood levee.
c. A document showing that the floodmap enclosed is a 100 year floodmap.

3. Traffic Information (B-4)

Provide information on estimated volume of traffic, the road's load-bearing capacity, the traffic control signals and the access road surfacing.

4. Containers (D-1)

Please describe in greater detail the primary drum unloading facility procedures and where it is located on the site. Please include information on system capacity and control of run-on.

5. Tank Description (D-2)

Please provide the following:

a. Information on the tank's internal pressure and any pressure controls.
b. Information on the corrosion effect of the tank walls.
c. A description of the feed systems, safety cut-off and by-pass systems.

6. Security Procedures and Equipment (F-1)

a. What is the traffic control procedures for arrivals or departures at the facility during working hours? During closing hours?
b. What is the procedures that an employee follows while on security duty? (Example: Walk the fence, checks doors, etc.)

7. General Inspection Schedule (F-2A)

   a. Who inspects the safety, emergency and process equipment?
   b. Please list what process equipment is checked (example flow monitors, gas detectors, spill control, etc.)?
   c. On page 40, how frequent is continuous?
   d. Identification of the types of problems to be inspected (F-2A(1)).

8. Tank Inspection (F-2B)

   a. Please provide information about the overfilling control equipment and pressure or temperature gauges.
   b. Please provide procedures for inspection of tank interior.

9. Preparedness and Prevention Requirements (F-3)

   Please address this section.

10. Preventive Procedures, Structures, and Equipment (F-4)

   a. Please describe the improvised dike area.
   b. Please outline the procedures for accidental spills.
   c. Please describe where the plant is diked and where it is paved (F-4c).
   d. Is the personal protection equipment OSHA approved?

11. Contingency Plan (G-1)

   a. Please show where the dikes, sump pumps, drainage system and other spill control are located on the site.
   b. Where will a copy of the emergency reports be located?

12. Closure Plans, Post-Closure Plans and Financial Requirements

   a. Please provide a detailed closure plan.
   b. Please file one of the following documents:

      Financial Report
      Letter of Credit
      Stand By Trust Fund
      Surety Bond

ML:bjh/7635C/5,6

5HW

JUN 1 6 1983

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Larry Eastep, Manager
Permits Section, DLPC
Illinois EPA
2200 Churchill Road
Springfield, Illinois 62706

Re: Part B Application
Motor Oils Refining Company
ILD 000646786

Dear Mr. Eastep:

I am herewith transferring the Part B hazardous waste permit application for the referenced facility. Please evaluate the application for completeness using the enclosed checklist, and return the filled-out checklist with a draft letter of response by July 11, 1983.

Please contact Mrs. Edith Ardiente of my staff, at (312) 886-7457 if you need additional information.

Sincerely,

William H. Miner, Chief
Technical, Permit, and Compliance Section

Enclosures

bcc: R. Stone
C.L. Lewis, GCMU
L. Marrable VERSAR

5HW:E.ARDIENTE:ad 6/14/83 Disk #X

Conc 6/16/83

	TYPIST	AUTHOR	STU #1 CHIEF	STU #2 CHIEF	STU #3 CHIEF	TPS CHIEF	WMB CHIEF	WMD DIRECTOR
INITIALS	A.D.							
DATE	6-15-83	6/15/83	6/15/83			6/16/83		

Mr. John P. O'Connell
President
Motor Oils Refining Company
7601 West 47th Street
McCook, Illinois 60525

5HW

MAR 23 1983

Re: Part B Application
Motors Oils Refining Company
ILD000646786

Dear Mr. O'Connell:

This is to respond to your Mr. Salmon's letter to Mrs. Ardiente dated February 11, 1983, and your telephone conversation with her on March 7, 1983.

On both occasions, you have indicated that your facility is a re-refiner of waste oil. You also indicated that you do not handle hazardous waste which is a sludge or which is listed in Subpart D or which contains one or more hazardous wastes listed under Subpart D. You represented that the waste oils you handle only exhibit the hazardous characteristics of corrosivity (D002) and EP toxicity with respect to lead (D008).

Based on the above representations, the United States Environmental Protection Agency (U.S. EPA) has determined that your facility could qualify under the recycling provision of 40 CFR Part 261.6. Under Part 261.6(a), the type of hazardous wastes you handle as described above, are exempt from regulations under 40 CFR Parts 262 through 265 or Parts 122 through 124 and the notification requirements of Section 3010 of the Resource Conservation and Recovery Act (RCRA).

Therefore, your facility is not required to have a hazardous waste permit under Section 3005 of RCRA at this time. However, it would be necessary for you to withdraw your Part A permit application, in writing, for U.S. EPA to rescind its Part B permit application request.

Please contact Mrs. Edith M. Ardiente of my staff at (312) 886-7457, if you have any questions on the above matter.

Sincerely,

William H. Miner, Chief
Technical, Permits, and Compliance Section

cc: Robert Kuykendall, IEPA
Cliff Gould, IEPA

bcc: Bob Stone
Chuck Lewis

5HW:ARDIENTE/mp 3/14/83

INITIALS / DATE	TYPIST	AUTHOR	STU #1 CHIEF	STU #2 CHIEF	STU #3 CHIEF	TPS CHIEF	WMB CHIEF	WMD DIRECTOR
	mp 3/17/83	3/17/83	3/17/83			3/18/83		

Motor Oils Refining Company

May 31, 1983

RECEIVED
JUN 2 1983
WASTE MANAGEMENT BRANCH
EPA, REGION V

Ms. Edith M. Ardiente
RCRA Activities
Part B Permit Application
U.S. EPA, Region V
P.O. Box A3587
Chicago, Illinois 60690-3587

Dear Ms. Ardiente:

Per our earlier conversation, we have completed Part B of the RCRA requirements.

If you need any additional information, please let me know.

Sincerely,

John P. O'Connell
President

JPO/dmg

Attachments

received
6-3-83

COPY 2

7601 West 47th Street McCook, Illinois 60525

General Office: Chicago (312) 242-2252 Suburban (312) 788-9017 Plant: Chicago (312) 242-2306 Suburban (312) 442-6166

Versak file

Motor Oils Refining Company

RECEIVED
APR 01 1983
WASTE MANAGEMENT BRANCH

March 30, 1983

Mr. William H. Miner
United States Environmental Protection Agency
Region V
230 South Dearborn Street
Chicago, Illinois 60604

Reference: Part B Application
Motor Oils Refining Company
ILD000646786 PA, G, TSD, PAS1

Dear Mr. Miner:

Thank you very much for responding to our request for an exclusion from the requirement to complete the Part B Permit application. As per our conversation today with Mrs. Ardiente, we will maintain the Part A Permit but are not required to complete the Part B Permit application until such time as the EPA notifies us that we are to proceed. It is our understanding that your notification will occur after the EPA finalizes its regulations related to re-refining facilities for used oils.

I feel this approach will provide us with the complete regulations related to our facility before we are to complete Part B, while at the same time keep us registered with the EPA under Part A.

Again thank you for your efforts in clarifying the above.

Sincerely,

John P. O'Connell
President

JPO/dmg

cc: Edith Ardiente
Robert Kuykendall

RECEIVED 4/08/83

7601 West 47th Street McCook, Illinois 60525

General Office: Chicago (312) 242-2252 Suburban (312) 788-9017 Plant: Chicago (312) 242-2306 Suburban (312) 442-6166

Motor Oils Refining Company

February 11, 1983

Ms. Edith M. Ardiente
RCRA Activities
USEPA Region V
P.O. Box A3587
Chicago, Illinois 60690-3587

ILD000644678 6 PA, G, TSD, ~~PAS~~

Dear Ms. Ardiente:

A few weeks ago, I spoke with you regarding our receipt of a RCRA Part B permit application request. In our conversation, I indicated that Motor Oils' principal function is that of a re-refiner of used oil. I mentioned that, since the used oil regulations have never been published, it is very difficult for us to identify how our operation fits into the RCRA Part B permit process.

We are hopeful that the USEPA will reconsider its request for our Part B application. We would like to have the request for our Part B application rescinded and a new request issued following publication of the used oil regulations.

Due to my pending departure from Motor Oils Refining, please address your response to John P. O'Connell, President.

Thank you for your assistance in this matter.

Best regards,

James T. Salmon

James T. Salmon
Environmental Coordinator

JTS/cc

RECEIVED
2/14/83

RECEIVED
FEB 14 1983
WASTE MANAGEMENT BRANCH
EPA, REGION V

7601 West 47th Street McCook, Illinois 60525
General Office: Chicago (312) 242-2252 Suburban (312) 788-9017 Plant: Chicago (312) 242-2306 Suburban (312) 442-6166

SHW-TUB

NOV 24 1982

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. James Selmon
Motor Oils Refining Company
7601 West 47th Street
McCook, Illinois 60525

RE: Motor Oils Refining Company
7601 West 47th Street
McCook, Illinois 60525
ILD 000646786

Dear Mr. Selmon:

By now you should have received an acknowledgement of our receipt of the Part A permit application material for the above-referenced hazardous waste facility under the Resource Conservation and Recovery Act (RCRA) permit program.

Accordingly, this letter constitutes the next step in the formal process leading toward issuance or denial of a RCRA permit. Under the authority of 40 CFR 122.27, this is a formal request for submittal of Part B of the permit application for the above-referenced facility.

Enclosed is a copy of 40 CFR 122.25 which lists the items required for submitting the Part B permit application for the facility. The Part B application must be submitted in quadruplicate and postmarked no later than May 31, 1983. Please uniquely number each page of the application including all attachments (maps, specifications, etc.). A certification statement identical to one stated in 40 CFR 122.6(d) must accompany the application and all additional submittals. Send your application to the following address:

RCRA ACTIVITIES
Part B Permit Application
U.S. EPA, Region V
P.O. Box A3587
Chicago, Illinois 60690-3587

We are committed to conducting the RCRA permitting process as efficiently as possible. Consequently, I suggest you contact Ms. Edith N. Ardiente my staff, at (312) 886-7457, as you begin preparing your application. Ms. Ardiente will be available to discuss specific needs of your application or to meet with you in Chicago. These efforts are intended to generate complete applications, without requiring any information beyond that which is necessary to make RCRA permit decisions.

Failure to furnish the complete Part B permit application by the above date, and to provide in full all required information, is grounds for termination of interim status under 40 CFR 122.27.

Information you submit in the Part B permit application can be disclosed to the public, according to the Freedom of Information Act and U.S. Environmental Protection Agency (U.S. EPA) Freedom of Information regulations. If you wish, however, you may assert a claim of business confidentiality by printing the word "Confidential" on each page of the application which you believe contains confidential business information. U.S. EPA will review business confidentiality claims under regulations at 40 CFR Part 2, and will later request substantiation of any claims. Please review these rules carefully before making a claim.

If you claim parts of your application as confidential, please provide us with a public information copy of the application. The public information copy must be identical to the full application with the exclusion of the confidential information.

We have also enclosed a copy of 40 CFR Part 264 which includes technical standards for the operation of treatment and storage facilities. These standards will become applicable upon issuance of a RCRA permit to your facility by U.S. EPA.

We will coordinate review of the application with the Illinois Environmental Protection Agency, and if the application is acceptable, will strive for a simultaneous issuance of federal and State hazardous waste facility permits. It is possible that during the processing of the application, the State hazardous waste program may become authorized to issue RCRA permits for your type of facility. In that case, direct Federal processing will cease, and the State in lieu of U.S. EPA will make the final determination on your permit application.

We look forward to receiving your Part B permit application.

Sincerely yours,

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

Enclosures: 40 CFR 122.25
40 CFR 264

cc: Kenneth L. Fredette
Vice President - Financial
MOBIL Energy, Inc.,
7601 West 67th Street
McCook, Illinois 60525

Robert G. Kaytendall, IEPA

bcc: Part A file
Edith Ardiente

5HW-TUB:E.ARDIENTE:ad 11/18/82

3 of 567 permit Transfer * Pink

Illinois Environmental Protection Agency · 2200 Churchill Road, Springfield, IL 62706

217/782-6762

Refer to: 16106505 -- Rock Island County
Rock Island/A-A Waste Oil Service
Permit No. 1981-44-OP

December 1, 1981
Revised December 9, 1983 (to reflect permit transfer)

ILD 000 810 291

Moreco Energy, Inc.
7601 West 47th Street
McCook, Illinois 60525

A-A Waste Oil Service
1800 78th Avenue West
Rock Island, Illinois 61201

Gentlemen: Mar

Permit is hereby granted to Moreco Energy, Inc., as owner and operator of A-A Waste Oil Service to operate a waste management facility consisting of 2.04 acres in the north half of the Northwest quarter of the Northeast quarter of Section 27, Township 17 North, Range 2 West of the Fourth Principal Meridian, Rock Island County, Illinois, and more fully described in the May 26, 1981 reapplication to store, process and transfer liquid special waste, all in accordance with the application prepared by Michael W. Rapps, P.E.; said application consisting of fifteen pages, one quadrange map and one plan sheet, all dated September 18, 1980, thirty-six pages and one plan sheet (revised) all dated May 26, 1981 and received by the Agency on May 26, 1981, four pages dated July 8, 1981 and received on July 10, 1981, seven pages dated August 14, 1981 and received August 19, 1981, two pages and one plan sheet all dated October 21, 1981 and received October 22, 1981, and seven pages dated October 22, 1981 and received October 23, 1981. and an application for permit transfer consisting of three pages, dated August 30, 1983 and received by the Agency on September 29, 1983.

This permit is issued subject to the standard conditions attached hereto and incorporated herein by reference, and further subject to the following special conditions:

1. This facility shall be developed and operated in accordance with Chapters 2, 7 and 9 of the Illinois Pollution Control Board Rules and Regulations.

2. This permit allows for development and operation of a site to store, process and transfer liquid special wastes.

3. The maximum volume of special waste at the site at any time shall be 466,000 gallons.

4. Special waste received at the facility shall be limited to the following:

   A. Waste Oils for processing

      1. Motor oil
      2. Industrial lubricating oil
      3. Hydraulic oil
      4. Cutting oil
      5. Cooling oil
      6. Insulating oil
      7. Quench oil

   B. Petroleum refinery wastes for processing

      1. API separator sludge
      2. Dissolved air flotation (DAF) float
      3. Slop oil emulsion
      4. Heat exchanger cleaning sludges
      5. Contaminated products

   C. Aromatic solvents for storage & transfer

      1. Benzene
      2. Cumene
      3. Ethyl benzene
      4. Toluene
      5. Xylene

5. Special wastes received at the facility for storage and/or treatment shall be transported to the facility utilizing the Agency's supplemental permit system and manifest system.

6. Special waste generated at the site for disposal, incineration or further treatment elsewhere shall be transported to the receiving facility utilizing the Agency's supplemental permit system and manifest system.

7. This permit is issued with the expressed understanding that no process discharge to Waters of the State or to a sanitary sewer will occur from these facilities. If such discharge occurs, additional or alternate facilities shall be provided. The construction of such additional or alternate facilities may not be started until a permit for their construction has been issued by this Agency.

8. This permit is subject to review and modification by the Agency as deemed necessary to fulfill the intent and purpose of the Environmental Protection Act, and all applicable environmental rules and regulations.

9. On a monthly basis, the volume of special waste received shall be equal to the volume of special wastes removed from the facility.

10. Further proposed modifications to the existing facility shall be the subject of an application for supplemental permit submitted to this office.

Sincerely,

Lawrence W. Eastep, P.E., Manager
Permit Section
Division of Land Pollution Control

LWE:JRR:tk/40-42

Attachment

cc: Rockford Region
DAPC - Permit Section
Michael Rapps, P.E.
DLPC Division File

Log 568 permit transfer & Pink

Illinois Environmental Protection Agency · 2200 Churchill Road, Springfield, IL 62706

217/782-6762

Refer to: 16712015 -- Sangamon County
Springfield/Pierce Waste Oil
Permit No. 1980-17-OP

May 5, 1981
REVISED November 23, 1983 (TO REFLECT PERMIT TRANSFER)

ILD 041 538 687

Pierce Waste Oil Service, Inc.
1925 E. Madison Street
Springfield, Illinois 62703

MORECO Energy, Inc.
7601 West 47th Street
McCook, Illinois 60525

Gentlemen:

Permit is hereby granted to MORECO Energy, Inc., as owner and operator of Pierce Waste Oil Service to operate a solid waste management site consisting of 3.67 acres in the East ½ of the Southwest ¼ of Section 26, Township 16 North, Range 5 West, Third Principal Meridian, also described as 1925 E. Madison St., Springfield, Illinois, to store and process waste oils, all in accordance with the application prepared by Michael W. Rapps, P.E.: Said application consisting of 17 pages, one plan sheet and one quadrangle map, all dated March 28, 1980 and received by the Agency on March 31, 1980 and application for permit to operate the facility consisting of six pages dated December 31, 1976 and received by the Agency March 31, 1981; and an application for permit transfer consisting of three pages, dated August 30, 1983 and received by the Agency on September 29, 1983.

This permit is issued subject to the standard conditions set forth on page 3, attached hereto and incorporated herein by reference, and further subject to the following special conditions:

1. This facility shall be developed in accordance with Chapters 2, 7 and 9 of the Illinois Pollution Control Board Rules and Regulations.

2. This facility shall be developed in accordance with Air Pollution Control I.D. No. 167120AIZ which expires January 29, 1984.

3. Special wastes generated at the site for disposal, incineration or further treatment elsewhere shall be transported to the receiving facility utilizing the Agency's supplemental permit system and manifest system.

4. This permit is issued with the expressed understanding that no process discharge to Waters of the State or to a sanitary sewer will occur from these facilities. If such discharge occurs, additional or alternate facilities shall be provided. The construction of such additional or alternate facilities may not be started until a permit for their construction has been issued by this Agency.

5. Special wastes received at the site for recovery shall be transported to the facility utilizing the Agency's supplemental permit system and manifest system.

6. Any special waste generated at this facility for disposal shall be disposed of at an IEPA permitted site, utilizing this Agency's supplemental permit system and manifest system.

7. This permit is subject to review and modification by the Agency as deemed necessary to fulfill the intent and purpose of the Environmental Protection Act, and all applicable environmental rules and regulations.

Very truly yours,

Lawrence W. Eastep

Lawrence W. Eastep, P.E., Manager
Permit Section
Division of Land Pollution Control

LWE:EPT:mks:1/9

Attachment

cc: Permit Section, DAPC
Central Region

Sp Waste Unit

217/782-6760

ILD 041 538 687

Refer to: 1612015 - Sangamon County - Springfield/Pierce Waste Oil
Permit No. 1980-17-OP
Supplemental Permit No. 1982-15

February 10, 1982

If they want
Submit New Part A ← New Owners Name

Pierce Waste Oil
1925 East Madison
Springfield, Illinois 62702

Gentlemen:

Supplemental permit is hereby granted to Pierce Waste Oil to modify the referenced facility, all in accordance with the application and plans prepared by Michael Rapps, P.E.; said application consisting of forty-nine pages and one plan sheet, all dated November 6, 1981 received by the Agency on November 10, 1981; twenty-nine pages dated January 8, 1982 and received by the Agency January 8, 1982.

This permit is subject to the following special conditions:

1. The following types of wastes may be received at the facility, utilizing the special waste authorization system and manifest systems:

   A. Waste Oils

      1. Motor oil
      2. Industrial lubricating oil
      3. Hydraulic oil
      4. Cutting oil
      5. Coolant oil
      6. Insulating oil
      7. Quenching oil

   B. Petroleum Refinery Wastes

      1. API separator sludge
      2. Dissolved Air Flotation (DAF) Float
      3. Slop oil emulsion
      4. Heat exchanger bundle cleaning sludges
      5. Miscellaneous oil refinery wastes

   C. Hydrocarbon Mixtures

2. Applications for special waste authorization shall state the specific waste name from Special Condition #1 above.

3. The following wastes shall not be accepted at the facility:

   A. Spent halogenated solvent.
   B. Waste solvent from paint.
   C. Oil with PCB concentrations in excess of 50 ppm.

4. All special wastes generated at this facility for disposal must be analized for E. P. toxic metals and reactive cyanide and sulfides.

5. For DAF float and API separator sludge, oil content shall be stated in percent by volume and EP toxic test results shall be stated in parts per million for special waste stream authorization applications.

6. Recovered oils leaving the facility shall have a maximum of 10% solvent by volume.

7. This facility shall be developed and operated in accordance with Chapters 2, 3, 7 and 9 of the Illinois Pollution Control Board Rules and Regulations and all permits issued pursuant to those rules and regulations.

8. This permit is subject to review and modification by the Agency as deemed necessary to fulfill the intent and purpose of the Environmental Protection Act, and all applicable environmental rules and regulations.

9. This permit is issued with the expressed understanding that no process discharge to Waters of the State or to a sanitary sewer will occur from these facilities. If such discharge occurs, additional or alternate facilities shall be provided. The construction of such additional or alternate facilities may not be started until a permit for their construction has been issued by the Agency.

10. Any modifidcation to the facility, treatment process, types or amounts of wastes handled shall be subject of an application for supplemental permit for site modification submitted to this Agency.

11. No wastes described in this permit shall be received at the facility for processing and/or storage until such time as a permit for the equipment for said processing and/or storage is obtained from this Agency's Division of Air Pollution Control.

Except as modified above, the facility shall be developed and operated in accordance with Permit No. 1980-17-OP, dated September 15, 1981.

Sincerely,

Thomas E. Cavanagh, Jr., Manager
Residual Management Section
Division of Land/Noise Pollution Control

TEC:SS:jd/3444C/10-12

cc: M. Rapps & Associates
Special Waste Unit
Central Region
APC - Permit Section

Log 565 permit transfer + Pink

Illinois Environmental Protection Agency · 2200 Churchill Road, Springfield, IL 62706

217/782-6760

Refer to: 18381301 - VERMILION COUNTY
OAKWOOD/DUNAVAN OIL
PERMIT NO. 1980-27-DE

September 2, 1980
REVISED November 10, 1983 (TO REFLECT PERMIT TRANSFER)

Dunavan Oil Service ILD 980 794 929
Rural Route 1 -- Box 211A
Oakwood, Illinois 61858

Moreco Energy, Inc.
7601 West 47th Street
McCook, Illinois 60525

Gentlemen: Martin Pierce, O/O

Permit is hereby granted to Moreco Energy, Inc., owner and operator of Dunavan Oil, to develop a solid waste management site consisting of 5.12 acres described as 4.07 acres in the Northeast Quarter of the Northeast Quarter of Section 17, Township 19 North, Range 12 West of the Second Principal Meridian and 1.05 acres in the Northwest Quarter of the Northwest Quarter of Section 16, Township 19 North, Range 12 West of the Second Principal Meridian, Vermilion County, Illinois, to store, transfer and process hydrocarbons, all in accordance with the application and plans prepared by Michael Rapps, P.E.: Said application consisting of fifteen pages dated June 3, 1980, and received by this Agency June 4, 1980; one quadrangle map and one plan sheet both received June 4, 1980; and an application for permit transfer consisting of three pages, dated August 30, 1983 and received by the Agency on September 29, 1983.

This permit is issued subject to the standard conditions set forth on page 3 attached hereto and incorporated herein by reference, and further subject to the following special conditions:

1. This facility shall be developed in accordance with Chapters 2, 7 and 9 of the Illinois Pollution Control Board Rules and Regulations.

2. Any special waste generated at this facility for disposal shall be disposed of at an IEPA permitted site, utilizing this Agency's supplemental permit system and manifest system.

3. Prior to the issuance of an operating permit for this facility, a "spill prevention and emergency plan" shall be submitted to the Agency.

4. Prior to the issuance of an operating permit, copies of permits for all storage tanks issued by the Agency's Division of Air Pollution Control shall be submitted to this Division.

5. The ponds are not a part of this permit. A soils and geologic investigation shall be conducted and a report submitted to the Agency to show the pollution potential of the "oil separation ponds" and "clear water ponds". If the report shows that the site is inadequate for continued use as ponds, or if no investigation is completed, a closure plan acceptable to the Agency shall be submitted. This shall be done prior to the issuance of an operating permit.

6. This facility shall be developed in accordance with existing fire prevention laws.

7. This permit is subject to review and modification by the Agency as deemed necessary to fulfill the intent and purpose of the Environmental Protection Act and all applicable environmental rules and regulations.

8. Prior to the issuance of an operating permit, an accurate, up-to-date list of equipment and storage tanks shall be submitted to this office.

Very truly yours,

Lawrence W. Eastep, P.E., Manager
Permit Section
Division of Land Pollution Control

EPT

LWE:MKL:qml/8347c/21-22

Attachment

cc: Central Region
Compliance Monitoring Section
Division File
BARB BALLARD
AIR POLLUTION

217/782-9884

Refer to: 0317402 -- Cook County
McCook/Motor Oils Refining Co.
ILD000646786

December 19, 1983

Motor Oils Refining Co.
7601 West 47th Street
McCook, Illinois 60525

Attention: Mr. Kenneth L. Fredette

Dear Mr. Fredette:

We are in receipt of a copy of the Trust Fund which was submitted to Mr. William H. Miner of USEPA.

I would like to inform you that as of February 22, 1983, all financial instruments must be submitted to the State of Illinois, and the wording changed to reflect the State of Illinois regulations.

While reviewing your financial instruments I found that not all of your facilities are listed on all of your documents.

1. The insurance certificate which was submitted from the Zube Insurance Agency failed to have the required wording.

2. The certificate of insurance submitted November 9, 1982, shows only Moreco Energy Inc. of McCook covered by the policy. If this policy is to cover all of your facilities you must list all of the facilities. This certificate must also be changed to reflect the State of Illinois regulations.

3. The copy of the Trust Agreement fails to list all of your facilities. If the Trust Agreement is only for these two facilities, then you will have to provide some other type of instrument for all of your other facilities.

I would also like to inform you that all instruments must be original copies with an original ink signature.

If you have any questions, please do not hesitate to contact this writer at the above number.

Very truly yours,

Andrew A. Vollmer
Financial Assurance
Division of Land Pollution Control

AAV:nks:18/13

cc: File
Region

Motor Oils Refining Company

December 7, 1983

Mr. William H. Miner, Chief
Technical, Permits, Compliance Section
U.S. Environmental Protection Agency
Region V
230 South Dearborn Street
Chicago, Illinois 60604

RE: Part B Application - ILD000646786

Dear Mr. Miner:

Enclosed is a copy of our insurance certificate for environmental impairment liability insurance. Also enclosed is a copy of the Trust Agreement which I have submitted to Mr. John Vergeer of the Document Review Section of Continental Illinois National Bank & Trust Company of Chicago (telephone number 828-3470). As soon as Continental Bank accepts the position of "Trustee", we will put 5% of the total closure estimate into the trust fund.

We have just received your written requirements for additional Part B information on December 6, 1983. Our Plant Engineer, Mr. Brian McEwan, will reply with the additional information as soon as possible.

If you have any questions, please contact either Mr. McEwan or myself at 312/788-9017.

Sincerely,

Kenneth L. Fredette
Vice President of Finance

KLF/dmg

Enclosures

cc: J.P. O'Connell
B.D. McEwan
L. Eastep - IEPA

RECEIVED
DEC 12 1983
E.P.A. — D.L.P.C.
STATE OF ILLINOIS

7601 West 47th Street McCook, Illinois 60525
General Office: Chicago (312) 242-2252 Suburban (312) 788-9017 Plant: Chicago (312) 242-2306 Suburban (312) 442-6166

PART B DOCKET LOG

Please print

Facility MOTOR OILS REFINING

I.D. # ILD 000 646 786

Item No.	Item Date	Description	Item Filed*
140-1		Log	
2	6/2/83	Received Part B application at Versar	
3	6/6/83	Received Part B application at STA #1	
4	6/16/83	Sent Part B to State for review	
5	7/14/83	Received completeness review from State	
6	7/27/83	NOD sent to Motor Oils	
7	9/8/83	Received company's response to NOD	
8	9/20/83	Transmitted NOD response to State	
9	9/21/83	Received additional info from company responding to NOD	
10	11/7/83	Received letter from IEPA requesting additional info	
11	12/5/83	Sent letter to Motor Oils requesting immediate submittal of financial assurance for closure + additional technical info	
12	12/14/83	Received submission from Motor Oils with financial assurance dated 12/7/83	
13	1/6/84	Received submission from Motor Oils with responses to issues raised in USEPA 12/5/83 letter.	
14			

*Folder 1 is arranged by sections.

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
230 SOUTH DEARBORN ST
CHICAGO, ILLINOIS 60604

BCIRN

REPLY TO ATTENTION OF

5HW
J.P. O'CONNELL

5 DEC 1983

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. John P. O'Connell
President
Motor Oils Refining Company
7601 West 47th Street
Mc Cook, IL 60525

DEC 6 1983

Re: Part B Application
ILD006468669

Dear Mr. O'Connell:

Thank you for your September 8 and September 21, 1983 responses to our July 27, 1983 request for additional information relative to the above-referenced facility's Part B permit application.

We have reviewed the additional information submitted and have determined that you have not responded adequately to our request for submission of an appropriate financial assurance for closure, as required by 40 CFR Section 264.143. My staff has transmitted this to you verbally on September 27 and October 26, 1983, at which times you indicated that the document was being prepared. To date, we have not received that document and request that you submit it by December 9, 1983.

Although your submission to date is still considered incomplete, we have initiated the "adequacy review", during which we analyze the technical aspects of the application, in order to make a tentative decision to either prepare a draft permit or deny the application. Attached is a list of questions, the answers of which would aid us greatly during this technical review process. Please provide answers to these by December 30, 1983.

If you have any questions, please feel free to contact Mrs. Edith M. Ardiente of my staff, at (312) 886-0984.

Sincerely,

William H. Miner, Chief
Technical, Permits, Compliance Section

Attachments

cc: Larry Eastep, IEPA
Bill Radlinski, IEPA

5 DEC 1983

5HW

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. John P. O'Connell
President
Motor Oils Refining Company
7601 West 47th Street
Mc Cook, IL 60525

Re: Part B Application
ILD006468659

Dear Mr. O'Connell:

Thank you for your September 8 and September 21, 1983 responses to our July 27, 1983 request for additional information relative to the above-referenced facility's Part B permit application.

We have reviewed the additional information submitted and have determined that you have not responded adequately to our request for submission of an appropriate financial assurance for closure, as required by 40 CFR Section 264.143. My staff has transmitted this to you verbally on September 27 and October 26, 1983, at which times you indicated that the document was being prepared. To date, we have not received that document and request that you submit it by December 9, 1983.

Although your submission to date is still considered incomplete, we have initiated the "adequacy review", during which we analyze the technical aspects of the application, in order to make a tentative decision to either prepare a draft permit or deny the application. Attached is a list of questions, the answers of which would aid us greatly during this technical review process. Please provide answers to these by December 30, 1983.

If you have any questions, please feel free to contact Mrs. Edith M. Ardiente of my staff, at (312) 886-0984.

Sincerely,

ORIGINAL SIGNED BY
WILLIAM H. MINER
William H. Miner, Chief
Technical, Permits, Compliance Section

Attachments

cc: Larry Eastep, IEPA
Bill Radlinski, IEPA

	TYPIST	AUTHOR	STU #1 CHIEF	STU #2 CHIEF	STU #3 CHIEF	TPS CHIEF	WMB CHIEF	WMD DIRECTOR
5HW:E.Ardiente:ns:12/1/83								
INITIALS	NS		KW	HC	X			
DATE	12/1/83	12/1/83	12/1/83	12/1/83		12/2/83		

Qline 12.2

Motor Oils Refining Company
ILD000646786
Additional Part B Information

1. Waste Analysis Plan

   a. Is the lab report on page 24, an E.P. toxicity analysis for metals or a total analysis for metals? If it is total, what would the E.P. toxicity be?

   b. What is the maximum percentage of water and/or solids allowed in a shipment (see page 25)?

   c. On page 26, when does the laboratory manager require the viscosity, flash point and spectrographic analysis (a first time shipment, a suspicious load, spot checks, etc.)?

2. Process Information

   a. What procedures are used to ensure the drums are "emptied" (by triple rinsing, scraping, etc.)?

   b. How often are the tanks checked for internal corrosion (annually, monthly, weekly, etc.)?

   c. What procedure would be followed if one tank is taken out of service and then a problem develops with the other tank?

   d. Please provide a cross-section of Unloading Station 1.

      1) Does the truck sit on concrete or gravel?

      2) Does the ground slope to the collection sump?

      3) Is Station #1 diked?

   e. Where is the unloading station for Tank 100?

   f. What is unloaded at Unloading Station #2? (see page 15.20)

   g. Is the area around Tank 100 & 101 diked? Please provide a diagram for the area if the answer is yes.

   h. What tank storage is used for the diesel engine oil? Where is it unloaded?

3. Closure Plans

   a. Please provide a detailed closure plan for the Drum Unloading Area and all sumps.

Illinois Environmental Protection Agency · 2200 Churchill Road, Springfield, IL 62706

217/782-3983

Refer to: Part B Application, Motor Oils Refining Co. ILD000646786

November 1, 1983

Mrs. Edith Ardiente
Technical, Permits, Compliance Section
USEPA - Region V
230 South Dearborn
Chicago, Illinois 60604

Dear Mrs. Ardiente:

Enclosed is a copy of additional information needed before a written recommendation to issue or deny a permit can be completed on the Motor Oils Refining Co. Part B application.

If you have any questions regarding this application, please contact Marla Laymon at 217/782-3983.

Very truly yours,

Lawrence W. Eastep, P.E., Manager
Permit Section
Division of Land Pollution Control

LWE:ML:ba/8316c/15

Enclosure

cc: Northern Region
Division File

148 - 10

Deficiencies In Motor Oil Refining Company's (ILD000646786) Part B Application

1. Waste Analysis Plan

   a. Is the lab report on page 24, an E.P. toxicity analysis for metals or a total analysis for metals? If it is total, what would the E.P. toxicity be?

   b. What is the maximum percentage of water and/or solids allowed in a shipment (see page 25)?

   c. On page 26, when does the laboratory manager require the viscosity, flash point and spectrographic analysis (a first time shipment, a suspicious load, spot checks, etc.)?

2. Process Information

   a. What procedures are used to ensure the drums are "emptied" (by triple rinsing, scraping, etc.)?

   b. How often are the tanks checked for internal corrosion (annually, monthly, weekly, etc.)?

   c. What procedure would be followed if one tank is taken out of service and then a problem develops with the other tank?

   d. Please provide a cross-section of Unloading Station 1.

      1) Does the truck sit on concrete or gravel?

      2) Does the ground slope to the collection sump?

      3) Is Station #1 diked?

   e. Where is the unloading station for Tank 100?

   f. What is unloaded at Unloading Station #2? (see page 15.20)

   g. Is the area around Tank 100 & 101 diked? Please provide a diagram for the area if the answer is yes.

   h. What tank storage is used for the diesel engine oil? Where is it unloaded?

3. Closure Plans

   a. Please provide a detailed closure plan for the Drum Unloading Area and all sumps.

4. Financial Requirements

a. Please file one of the following documents:

Financial Test
Letter of Credit
Stand By Trust Fund
Surety Bond

LWE:ML:ba/8316c/16-17

SEP 2 8 1983

5HW

Larry Eastep, Manager
Permit Section, DLPC
Illinois Environmental Protection Agency
2200 Churchill Road
Springfield, Illinois 62706

Re: Part B Application Technical Review
Motor Oils Refining Company
ILD 000646786

Dear Mr. Eastep:

Attached are two copies of the subsequent submission (received September 21, 1983) from the above referenced facility for processing according to the FY'83 Cooperative Agreement.

This submission completes the company's response to our Notice of Deficiency. The first part of their response was transmitted to you on September 20,1983.

Please contact Mrs. Edith Ardiente of my staff, at (312) 886-7457, if you have any questions.

Sincerely yours,

William H. Miner, Chief
Technical, Permits, Compliance Section

Enclosures

bcc: C. Lewis
R. Stone
L. Marrable

	TYPIST	AUTHOR	STU #1 CHIEF	STU #2 CHIEF	STU #3 CHIEF	TPS CHIEF	WMB CHIEF	DI
INITIALS						dmr 9/28		
5HW:EArdiente:ad 9/26/83 Disk								
DATE	E.D. 9-27-83	9/27/83	9/29/83			9/28/8		

SEP 20 1983

5HW

Larry Eastep, Manager
Permit Section, DLPC
Illinois Environmental Protection
Agency
2200 Churchill Road
Springfield, Illinois 62706

Re: Part B Application Technical Review
Motor Oils Refining Co.
ILD 000646786

Dear Mr. Eastep:

We are herewith transferring a copy of the subsequent submission (received September 7, 1983) from the above referenced facility for processing according to the FY'83 Cooperative Agreement. Please provide the following to the Region V office within 60 days:

1. A written recommendation to issue or deny a permit based on your technical evaluation.

2. A written draft permit based on your specific recommendations.

Your cooperation in expediting this process is appreciated. Please contact Mrs. Editha M. Ardiente of my staff, at (312) 886-7457, with any questions.

Sincerely,

William H. Miner, Chief
Technical, Permits, and Compliance Section

Enclosures

5HW;Ardiente/mg 9/14/83

INITIALS / DATE	TYPIST	AUTHOR	STU #1 CHIEF	STU #2 CHIEF	STU #3 CHIEF	TPS CHIEF	WMB CHIEF	WMD DIRECTOR
	mg 9/14/83	9/14/83	9/15/83			mg 9/14/83 9/16/83		

Motor Oils Refining Company

Mr. William H. Miner, Chief
Technical, Permits and Compliance Section
U. S. Environmental Protection Agency, Region V
230 South Dearborn Street
Chicago, IL 60604

Dear Mr. Miner:

Motor Oils Refining Company has addressed the deficiencies to its Part B Application stated in your notice dated 27 July 1983. As a result we are submitting revisions to sections of the original application, in quadruplicate.

One item, a topographic map of the plant site, has not been completed by our contracted engineering firm. As soon as it is completed it will be forwarded to you as a page to insert in the application.

Attached you will find a brief summary of the revisions made to our application and four sets of revisions complete with instructions for posting.

We believe that our revised Part B Application adequately addresses the items contained in your notice. We remain ready to address any further questions you may have regarding the application.

John P. O'Connell
President

RECEIVED
SEP 07 1983
WASTE MANAGEMENT
BRANCH

7601 West 47th Street McCook, Illinois 60525
General Office: Chicago (312) 242-2252 Suburban (312) 788-9017 Plant: Chicago (312) 242-2306 Suburban (312) 442-6166

140-7

SUMMARY OF DEFICIENCY CORRECTIONS

The following is a synopsis of corrections made as indicated in your Notice of Deficiencies, Attachment A. We have attempted to identify the type of correction and indicate where the correction will be found in revised or inserted pages in the Part B Application.

1. Facility Description (B-1, 3)

   The incinerator is not a hazardous waste incinerator. It operates similar to a flare in that it burns the plant's cracked waste gases, which are byproducts of the main operations. It does have a state operating permit. This is addressed on the revised page 15.

2. Topographic Maps (B-2)

   A Plot Plan detailing buildings, sewers, fire control facilities, drainage barriers and run off control systems is included on inserted page 15.20. The topographic map of the plant site is not complete. It will be forwarded to you in September and it will be inserted page 16.10.

3. Floodplain Standard

   The complete map, including documentation that it is a 100 year floodmap, is on inserted page 18.10. Also the levee that is of concern to the plant is indicated on the floodmap.

4. Waste Analysis Plan (C-2a, 2d)

   This is addressed on revised page 26. The term "infrequently" has been changed to annually.

5. Traffic Information (B-4)

   The volume of traffic, the road's load-bearing capacity, the access road surfacing have all been added to revised page 19.

6. Containers (D-1)

   The procedure for unloading oil in containers is described in more detail. Also, included on revised page 30 and 31 is a detailed description of the 60'x15' concrete slab where the drums are emptied and consequently stored. This slab has a curb to prevent both run-on and run off with run off accumulated in the collection sump.

7. Tank Description (D-2)

The storage tanks are atmospheric pressure and there are no pressure controls on the tank (other than the vent). This is addressed on revised page 33. Information on corrosion and the details of the feed system are addressed on inserted page 33.10.

8. Security procedures and Equipment (F-1)

The traffic control procedures for arrivals and departures, and security procedures that plant employees follow are addressed on revised page 39.

9. General Inspection Schedule (F-2a)

The safety, emergency and process equipment inspectors, plus the list of process equipment is added on revised page 40. Inserted page 40.10 describes the items to be inspected on each item of safety and emergency equipment.

10. Tank Inspection (F-2B)

There are no pressure and temperature gauges on the storage tanks. Overfilling is prevented by Shift Supervisor and the Operator checking first for adequate volume before unloading. This is addressed on revised page 43 along with procedures for tank interior inspection.

11. Preparedness and Prevention Requirements (F-3)

The applicant does not wish to request a waiver of the preparedness and prevention requirements. This is stated on inserted page 44.10.

12. Preventive Procedures, Structures, and Equipment (F-4)

The procedures followed for accidental spills along with a more detailed description of the improvised dike area is addressed on revised page 45 F-4a. Also included on that page are areas where the plant is paved (F-4c) and a statement that the plant's protection equipment meets OSHA requirements (F-4e).

13. Contingency Plan (G-1)

The dikes, sump pumps, drainage system and other spill control devices are high-lighted on the Plot Plan drawing (page 15.10). Copies of the emergency reports will be located in the plant operations office as stated on revised page 52.

14. Closure Plans, Post-Closure Plans and Financial Requirements

A more detailed closure plan is addressed on revised page 79. A Financial Report is included on inserted page 81.01 thru 81.15.

B.1.2

MORECO Energy, Inc.

Motor Oils Refining Company

RCRA Part B

Application

Motor Oils Refining Company

May 31, 1983

Ms. Edith M. Ardiente
RCRA Activities
Part B Permit Application
U.S. EPA, Region V
P.O. Box A3587
Chicago, Illinois 60690-3587

Dear Ms. Ardiente:

Per our earlier conversation, we have completed Part B of the RCRA requirements.

If you need any additional information, please let me know.

Sincerely,

John P. O'Connell
President

JPO/dmg

Attachments

COPY 2

7601 West 47th Street McCook, Illinois 60525
General Office: Chicago (312) 242-2252 Suburban (312) 788-9017 Plant: Chicago (312) 242-2306 Suburban (312) 442-6166

SECTION A

PART A APPLICATION

Form Approved. OMB No. 158-R0175

(Fill—in areas are spaced for elite type, i.e., 12 characters/inch).

FORM 1 GENERAL

EPA (1/4/82)

U.S. ENVIRONMENTAL PROTECTION AGENCY

GENERAL INFORMATION

Consolidated Permits Program

(Read the "General Instructions" before starting.)

I. EPA I.D. NUMBER

F I L D 000646786

LABEL ITEMS

I. EPA I.D. NUMBER

II. FACILITY NAME

V. FACILITY MAILING ADDRESS

VI. FACILITY LOCATION

PLEASE PLACE LABEL IN THIS SPACE

GENERAL INSTRUCTIONS

If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill—in area below. Also, if any of the preprinted data is absent *(the area to the left of the label space lists the information that should appear)*, please provide it in the proper fill—in area(s) below. If the label is complete and correct, you need not complete items I, III, V, and VI *(except VI-B which must be completed regardless)*. Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold—faced terms.

SPECIFIC QUESTIONS	MARK 'X' YES	NO	FORM ATTACHED
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X	
B. Does or will this facility *(either existing or proposed)* include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		X	
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)		X	
D. Is this a proposed facility *(other than those described in A or B above)* which will result in a discharge to waters of the U.S.? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	X		
F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X	
H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	
J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	

III. NAME OF FACILITY

1 SKIP: M O T O R O I L S R E F I N I N G C O M P A N Y

IV. FACILITY CONTACT

A. NAME & TITLE *(last, first, & title)*	B. PHONE *(area code & no.)*		
2 S A L M O N J A M E S E N V I R O N. C O O R D	312	242	2252

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX

3 7601 West 47th Street

B. CITY OR TOWN	C. STATE	D. ZIP CODE
4 Mc Cook	IL.	60525

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER

5 7601 West 47th Street

B. COUNTY NAME

Cook

C. CITY OR TOWN	D. STATE	E. ZIP CODE	F. COUNTY CODE (If known)
6 Mc Cook	IL.	60525	031

CONTINUED FROM THE FRONT

VII. SIC CODES *(4-digit, in order of priority)*

A. FIRST	B. SECOND
2992 (specify) Lubricating Oils, Refining	(specify)
C. THIRD	**D. FOURTH**
(specify)	(specify)

VIII. OPERATOR INFORMATION

A. NAME

MORECO ENERGY INCORPORATED

B. Is the name listed in Item VIII-A also the owner? [X] YES [ ] NO

C. STATUS OF OPERATOR *(Enter the appropriate letter into the answer box; if "Other", specify.)*

F = FEDERAL; S = STATE; P = PRIVATE; M = PUBLIC *(other than federal or state)*; O = OTHER *(specify)*

M (specify)

D. PHONE *(area code & no.)*

A 312 242 2252

E. STREET OR P.O. BOX

7601 West 47th Street

F. CITY OR TOWN	G. STATE	H. ZIP CODE
McCook	IL.	60525

IX. INDIAN LAND

Is the facility located on Indian lands? [ ] YES [X] NO

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES *(Discharges to Surface Water)*	**D. PSD** *(Air Emissions from Proposed Sources)*	
N	P 031174 A.A.E.	
B. UIC *(Underground Injection of Fluids)*	**E. OTHER** *(specify)*	(specify) IEPA Land Pollution Operating Permit
U	1980-2-OP	
C. RCRA *(Hazardous Wastes)*	**E. OTHER** *(specify)*	(specify) Attached list of IEPA Special Waste Permits
R ILD000646786		

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property bounderies. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

XII. NATURE OF BUSINESS *(provide a brief description)*

Facility re-refines used lubricating oils. Recompounds and blends this oil into various finished lube oil products, i.e., motor oils, hydraulic oils, gear oils, etc.

XIII. CERTIFICATION *(see instructions)*

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE *(type or print)*	B. SIGNATURE	C. DATE SIGNED
Kenneth L. Fredette Vice President, Financial	Kenneth L. Fredette	1/14/82

COMMENTS FOR OFFICIAL USE ONLY

C

EPA Form 3510-1 (6-80) REVERSE

Please print or type in the unshaded areas only
(fill-in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved. OMB No. 158-S-0004

FORM 3 RCRA

EPA

U.S. ENVIRONMENTAL PROTECTION AGENCY
HAZARDOUS WASTE PERMIT APPLICATION

Consolidated Permits Program

(This information is required under Section 3005 of RCRA.)

I. EPA I.D. NUMBER

F I L D 0 0 0 6 4 6 7 8 6

FOR OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	COMMENTS

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below *(mark one box only)* to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION *(place an "X" below and provide the appropriate date)*

☐ 1. EXISTING FACILITY *(See Instructions for definition of "existing" facility. Complete item below.)*

FOR EXISTING FACILITIES, PROVIDE THE DATE *(yr., mo., & day)* OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED *(use the boxes to the left)*

C 8 | YR. | MO. | DAY

☐ 2. NEW FACILITY *(Complete item below.)*

FOR NEW FACILITIES, PROVIDE THE DATE *(yr., mo., & day)* OPERATION BEGAN OR IS EXPECTED TO BEGIN

YR. | MO. | DAY

B. REVISED APPLICATION *(place an "X" below and complete Item I above)*

☐ 1. FACILITY HAS INTERIM STATUS

☐ 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES — CODES AND DESIGN CAPACITIES

A. PROCESS CODE — Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process *(including its design capacity)* in the space provided on the form *(Item III-C)*.

B. PROCESS DESIGN CAPACITY — For each code entered in column A enter the capacity of the process.

1. AMOUNT — Enter the amount.
2. UNIT OF MEASURE — For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:		
CONTAINER *(barrel, drum, etc.)*	S01	GALLONS OR LITERS
TANK	S02	GALLONS OR LITERS
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS
Disposal:		
INJECTION WELL	D79	GALLONS OR LITERS
LANDFILL	D80	ACRE-FEET *(the volume that would cover one acre to a depth of one foot)* OR HECTARE-METER
LAND APPLICATION	D81	ACRES OR HECTARES
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Treatment:		
TANK	T01	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
OTHER *(Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)*	T04	GALLONS PER DAY OR LITERS PER DAY

UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G
LITERS	L
CUBIC YARDS	Y
CUBIC METERS	C
GALLONS PER DAY	U
LITERS PER DAY	V
TONS PER HOUR	D
METRIC TONS PER HOUR	W
GALLONS PER HOUR	E
LITERS PER HOUR	H
ACRE-FEET	A
HECTARE-METER	F
ACRES	B
HECTARES	Q

EXAMPLE FOR COMPLETING ITEM III *(shown in line numbers X-1 and X-2 below)*: A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

C DUP T/A C 1

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT (specify)	B. PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY	LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT (specify)	B. PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY
X-1	S02	600	G		5				
X-2	T03	20	E		6				
1	S02	2 500 000	G		7				
2					8				
3					9				
4					10				

Continued from the front.

III. PROCESSES (continued)

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:
   For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.
   For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.
   Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K054	900	P	T03 D80	
X-2	D002	400	P	T03 D80	
X-3	D001	100	P	T03 D80	
X-4	D002				included with above

Continued from page 2.
NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

Form Approved OMB No. 158-S80004

EPA I.D. NUMBER (enter from page 1)	T/A C	FOR OFFICIAL USE ONLY	T/A C	
W	1	W DUP	2	DUP

IV. DESCRIPTION OF HAZARDOUS WASTES *(continued)*

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
1	D 0 0 8	300 000	P	S 0 2	
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					
13					
14					
15					
16					
17					
18					
19					
20					
21					
22					
23					
24					
25					
26					

Continued from the front.

IV. DESCRIPTION OF HAZARDOUS WASTES *(continued)*

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

EPA I.D. NO. *(enter from page 1)*

F	I	L	D	0	0	0	6	4	6	7	86	6		
1	2									13	14	15		

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility *(see instructions for more detail)*.

VI. PHOTOGRAPHS

All existing facilities must include photographs *(aerial or ground-level)* that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas *(see instructions for more detail)*.

V FACILITY GEOGRAPHIC LOCATION

LATITUDE *(degrees, minutes, & seconds)*									LONGITUDE *(degrees, minutes, & seconds)*								
8	7	4	8	4	0	0			0	41	48			1	3	8	
65	66	67	68	69	-	71			72	-	74	75	76	77	-	79	

VIII. FACILITY OWNER

[X] A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER	2. PHONE NO. *(area code & no.)*
C E	
15 16 - 55	56 - 58 59 - 61 62 - 65

3. STREET OR P.O. BOX	4. CITY OR TOWN	5. ST.	6. ZIP CODE
C F	C G		
17 18 - 42	17 18 - 40	41 42	47 - 51

IX. OWNER CERTIFICATION

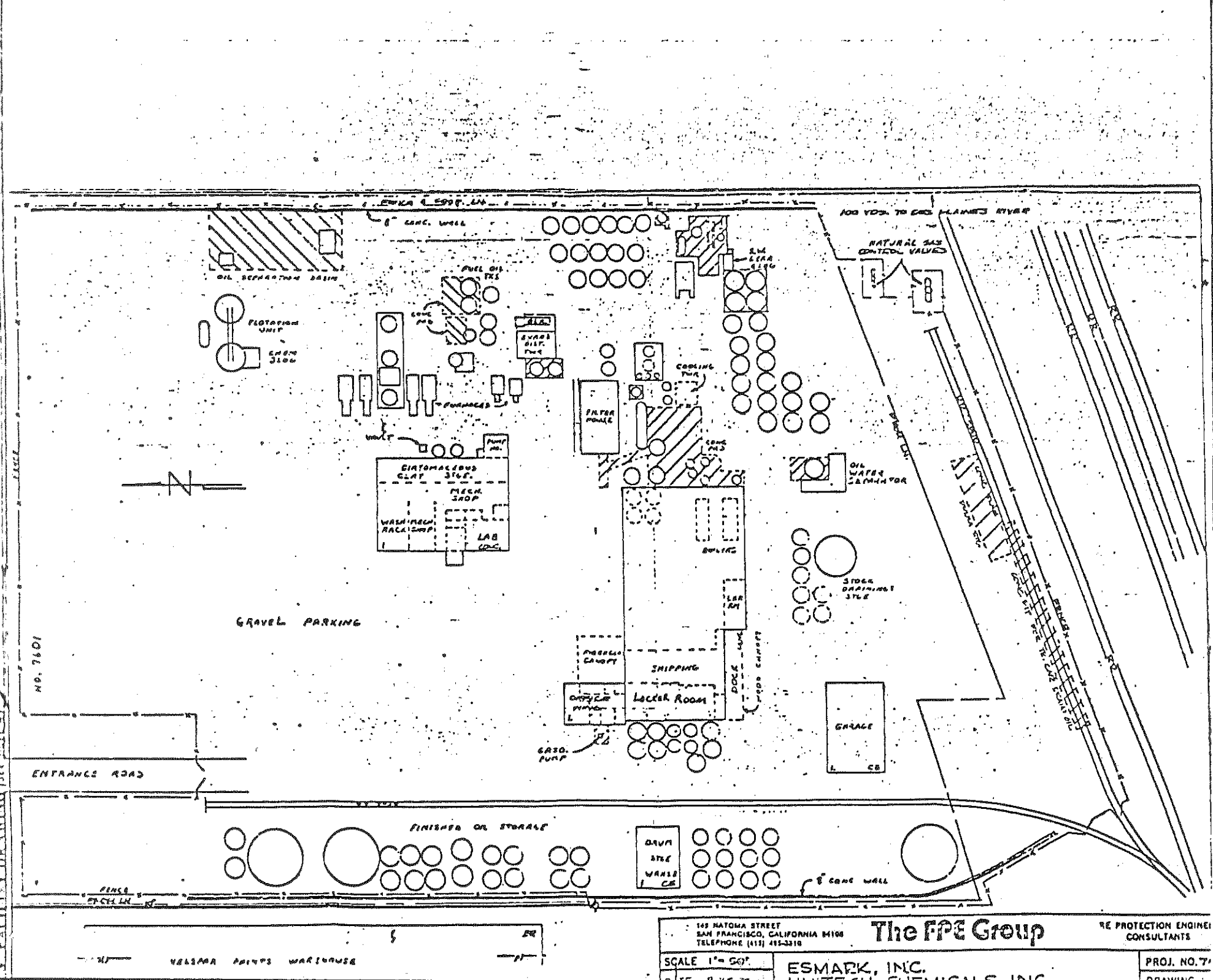
I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME *(print or type)*	B. SIGNATURE	C. DATE SIGNED
John P. O'Connell		1/4/82

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME *(print or type)*	B. SIGNATURE	C. DATE SIGNED
Kenneth L. Fredette		1/4/82



149 NATOMA STREET
SAN FRANCISCO, CALIFORNIA 94105
TELEPHONE (415) 495-3310

The FPE Group

FIRE PROTECTION ENGINEERING CONSULTANTS

SCALE 1" = 50'

ESMARK, INC.
UNITED CHEMICALS INC

PROJ. NO. 7'

DRAWING

ADDENDUM

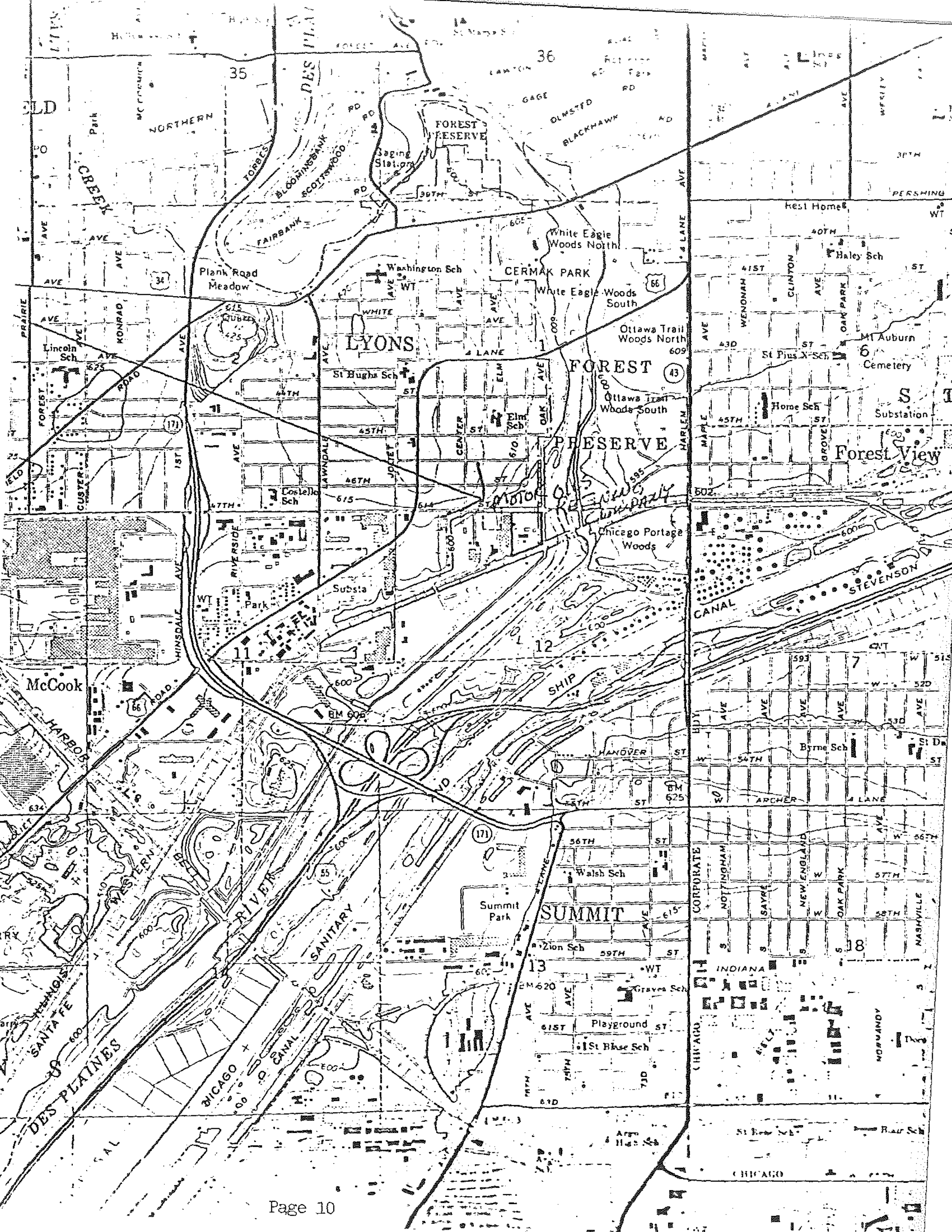
Motor Oils Refining Company is engaged in the business of re-refining used lubricating oils. We have capacity to produce approximately fifteen million gallons per year of re-refined lubricants. We use a re-refining treatment or process which utilizes tanks and distillation and processing vessels and other auxiliary equipment to accomplish this. It is our present understanding that this operation should not be listed on the attached EPA forms in that where material fed into a recycling operation, such material are excluded from such registrations. If, however, this interpretation is not right, we have included the required information to have such an operation listed and registered with the EPA.

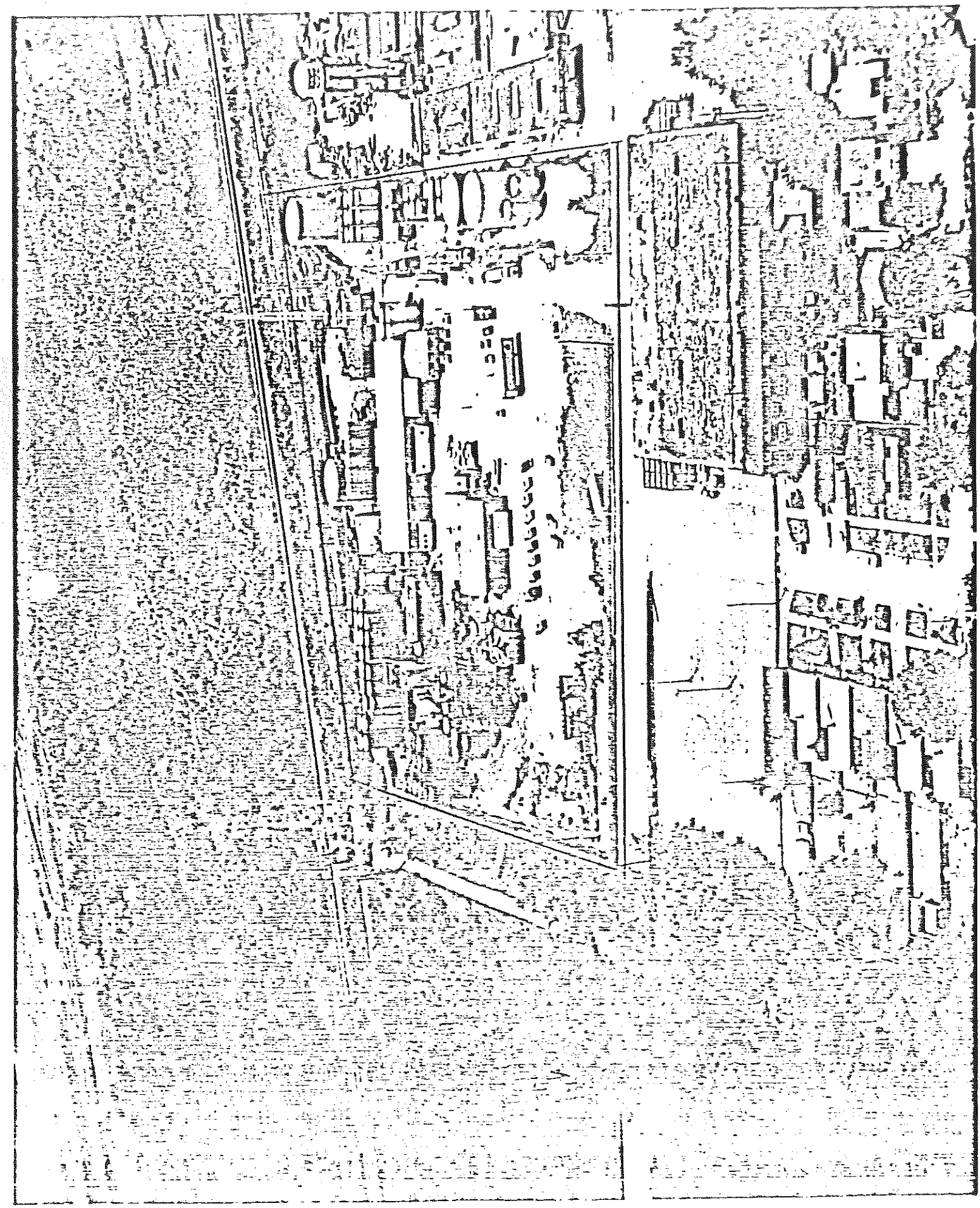
The capacity of our facility expressed as used lubricating oil input to our operation is approximately twenty million gallons per year based on what we feel is an average used oil quality. We have listed on the attached forms the waste which we generate at our facility which we feel come under the EPA reporting system. The above mentioned re-refining process and the used oil refining capacity are only included in this attachment.

If required, add the following:

ITEM III
A. T01, T04
B.1 60,000
B.2 U

ITEM IV
A. D008
B. 20,000,000
C. Y
D.1 T04 (Re-refining System)


35
36
FOREST PRESERVE
Gaging Station
NORTHERN
CREEK
FAIRBANK
BLOOMINGBANK
SCOTTSWOOD
39TH
40TH
41ST
PERSHING
Rest Home
Haley Sch
Plank Road Meadow
Washington Sch
CERMAK PARK
White Eagle Woods North
White Eagle Woods South
Ottawa Trail Woods North
Ottawa Trail Woods South
LYONS
Lincoln Sch
St Hughs Sch
FOREST
PRESERVE
Elm Sch
St Pius X Sch
Mt Auburn Cemetery
Home Sch
Substation
Forest View
44TH
45TH
46TH
47TH
Costello Sch
Motor Oil Refining Company
Chicago Portage Woods
Substa
Park
McCook
HARBOR
STEVENSON
CANAL
SHIP
Byrne Sch
HANOVER ST
54TH
ARCHER
56TH ST
Walsh Sch
57TH
58TH
Summit Park
SUMMIT
Zion Sch
59TH ST
INDIANA
Graves Sch
61ST
Playground ST
St Blase Sch
CORPORATE
NOTTINGHAM
SAYRE
NEW ENGLAND
OAK PARK
NASHVILLE
NORMANDY
HARLEM
LAWNDALE
JOLIET
RIVERSIDE
HINSDALE
CUSTER
KONRAD
PRAIRIE
WESTERN
RIVER
SANITARY
CHICAGO
SANTA FE
DES PLAINES
Argo High Sch
CHICAGO



Revised: 12/22/81

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991162	"
991212	"
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991596	
991647	2/4/82
991676	7/1/82
991690	"
991691	"
991705	"
991707	"
991708	
991757	3/1/82
991816	3/2/82
991925	7/1/82
991938	"
991939	"
991944	"
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992147	7/1/82
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992303	7/1/82
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992325	"
992326	"
992535	5/26/84
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992994	5/9/84
993043	6/30/84
993060	7/10/84
993061	6/23/84
993062	6/23/84
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993110	6/19/84
993116	"
993117	"
993144	6/22/84
993145	"
993148	"
993149	"
993155	"
993156	"
993221	6/26/84
993248	7/10/84
993273	3/18/84
993276	3/3/84
993277	5/5/84
993278	6/30/84
993284	7/10/84
993286	7/13/84
993389	6/23/84
993422	7/2/84
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993977	
993978	8/3/82
993979	8/20/82
993980	8/20/84
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Revised: 12/22/81

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993997	"
993998	8/3/82
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994011	8/14/84
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994246	"
994247	"

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994681	"
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994707	"
994772	10/14/84
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997159	10/30/84
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997953	"
997963	5/7/82
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998273	"
998276	"
998277	"
998290	"
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998695	9/9/82
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998853	"
998854	"

PERMIT NUMBER	EXPIRES
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998881	"
998882	"
998883	"
998886	"
998887	"
998888	"
998889	"
998891	"
998892	"
998893	"
998894	"
998899	"
998903	"
998907	

SECTION B

FACILITY DESCRIPTION

B - 1, 3

FACILITY DESCRIPTION

The processing plant, located in McCook, Illinois, re-refines waste oil through a proprietary vacuum distillation process. The process produces base oil which is then blended with virign blending oils and additives to produce lubricants meeting customer specifications.

The plant is situated on a 6.6 acre tract of land in an industrial area of McCook. There are two buildings on the site along with the distillation equipment and storage tanks for used oil, base oil, blending oil, and additives. Total tank capacity is approximately 2.6 M gallons. There are also provisions for handling drum quantities of all these materials.

Primary processing equipment consists of six (6) atmospheric distillation towers, three (3) vacuum distillation systems, six (6) process heaters, two (2) steam boilers, a Dowtherm vaporizer, a water treatment facility, and an incinerator. The total storage capacity is approximately 2.5 M gallons.

Used oil supplies come from three primary sources: railroads (diesel engine lube oil and car journal oil), industrial users (hydraulic, metalworking, and quenching oils), and automotive consumers (crank case oil). Railroad diesel engine used oil is segregated from the other lower viscosity oils throughout the system. This oil generally contains no lead. Storage for the lower viscosity used oil is limited to two (2) 250 K gallon tanks.

Process byproducts, a very heavy asphalt-like material and fuel oil are sold commercially. Some of the fuel oil is consumed internally for process heat. Approximately half the process heat is produced by burning natural gas.

Process water is collected and treated in an API separator and a DAF system. Since the plant is diked around the entire perimeter, rain water is also processed through the waste water treatment facility. The fuel oil mentioned above is removed from the API separator.

Light gases are drawn off the API separator, scrubbed, and consumed in the incinerator. The incinerator operates similar to a flare in that it burns the plant's cracked waste gases, which are byproducts of the main operations. No hazardous wastes are burned in the incinerator. This incinerator is incorporated in the plant's operating permit-Application Number 72110951.

Process area fire protection is provided by deluge and sprinkler systems, strategically located fire hydrants and hoses, and dry chemical extinguishers. A fire alarm is tied into the McCook fire department through ADT. No storage tanks contain ignitable substances.

Attached is a plot plan describing locations of buildings, sewers, fire control facilities, drainage barriers, and run off control systems for this facility.

Refering to the topographic map, page 16, residential areas are north of 47th Street. The areas south of 47th Street are industrial. The area southeast of the ship canal becomes residential again.

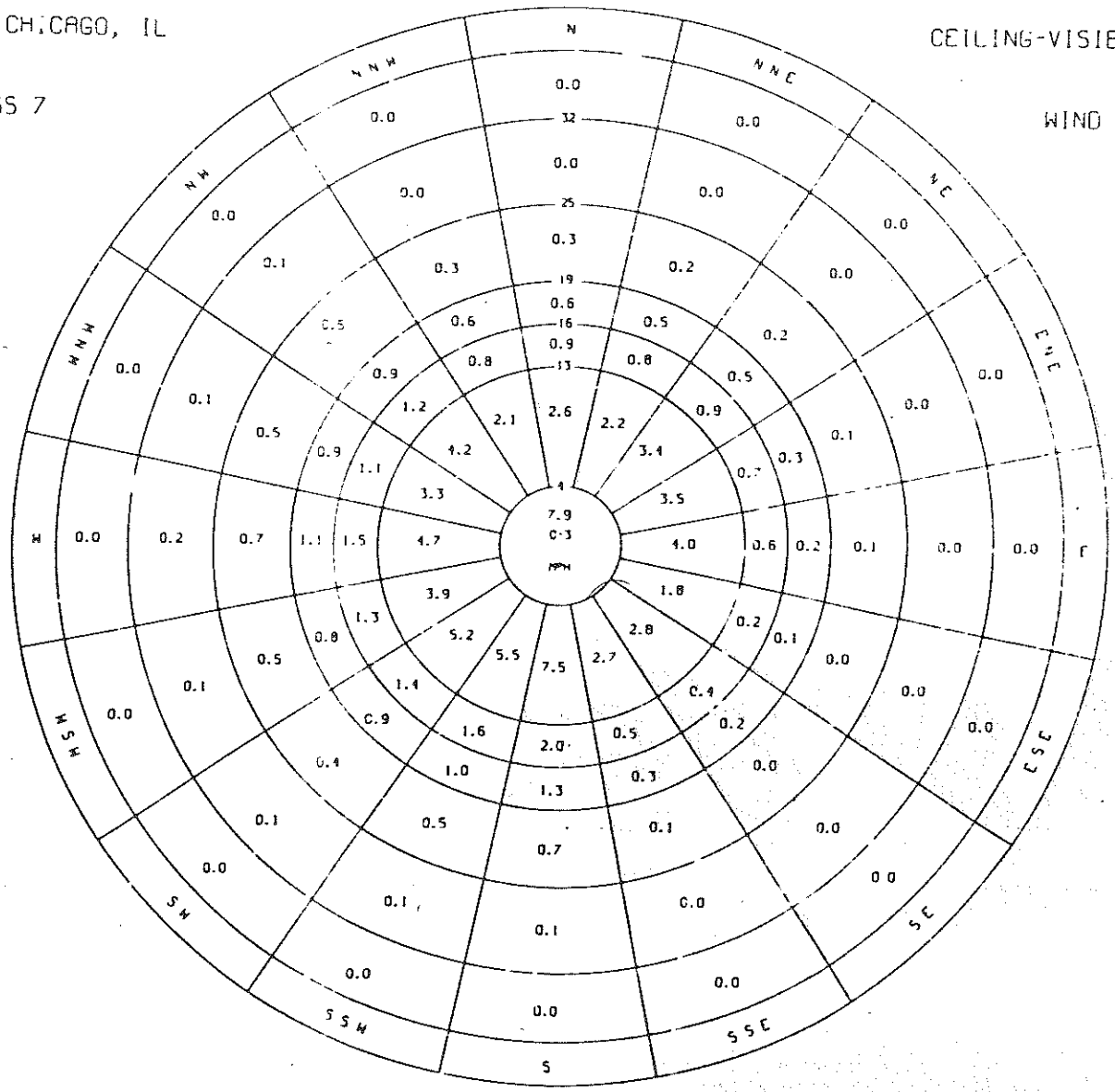
WIND ROSE

MDW CHICAGO, IL

CLASS 7

CEILING-VISIBILITY

WIND GRAPH



26

Source: NOAA, closest airport to Motor Oils Refining Company is Midway.

Date: 25 May 83
Revision No.: 0
B

B-2

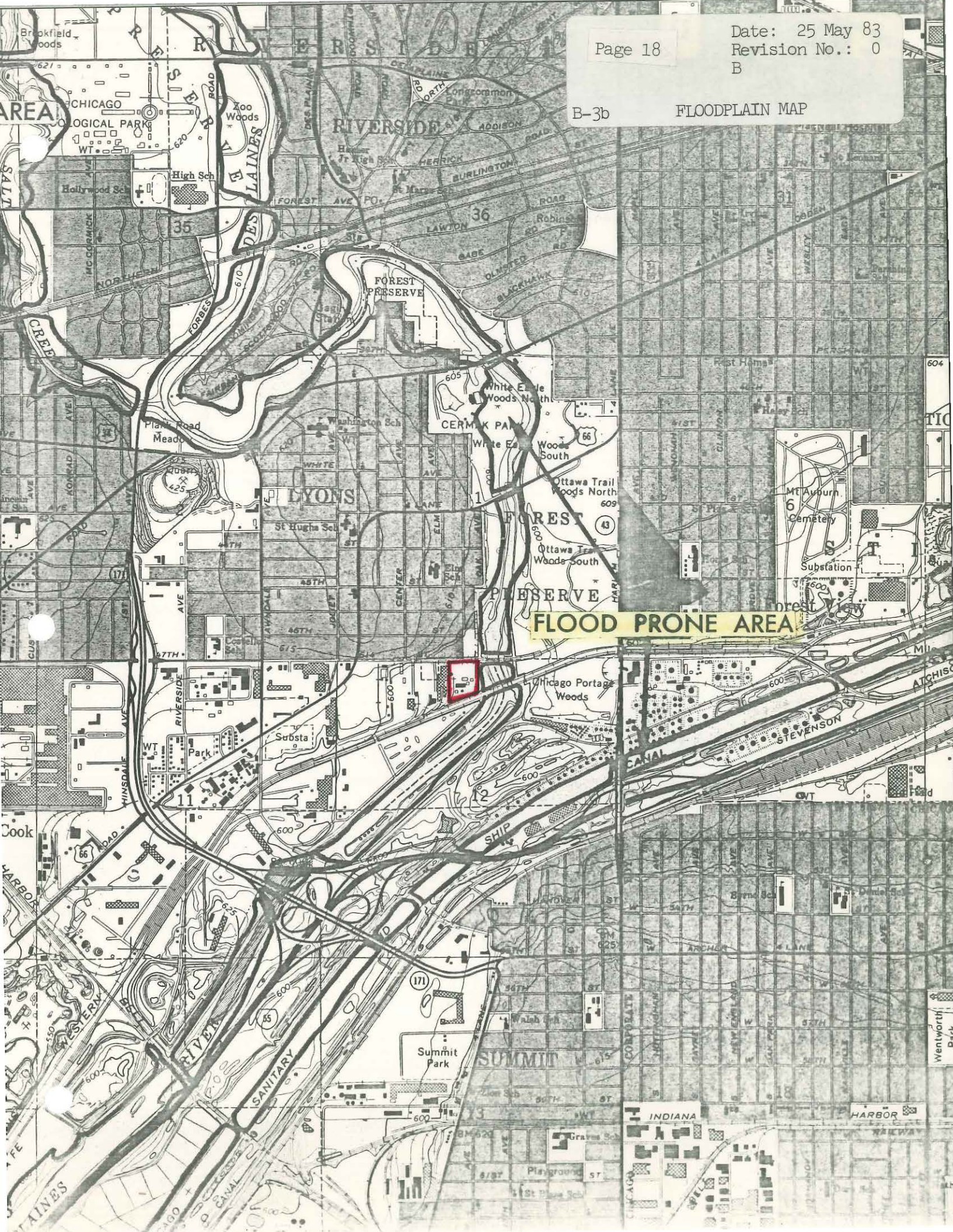
TOPOGRAPHIC MAP

Motor Oils Refining Company

7801 WEST 47th STREET, McCOOK, ILLINOIS 60525

Date: 25 May 83
Revision No.: 0
B

B-3b FLOODPLAIN MAP



B-4 TRAFFIC MANAGEMENT

The McCook plant is located adjacent to a four lane boulevard, 47th Street. This provides the only motor vehicular access to the facility. The drive entrance is approximately 0.6 miles west of the intersection of 47th Street and Harlem Avenue; 0.35 miles east of 47th Street and Joliet Road.

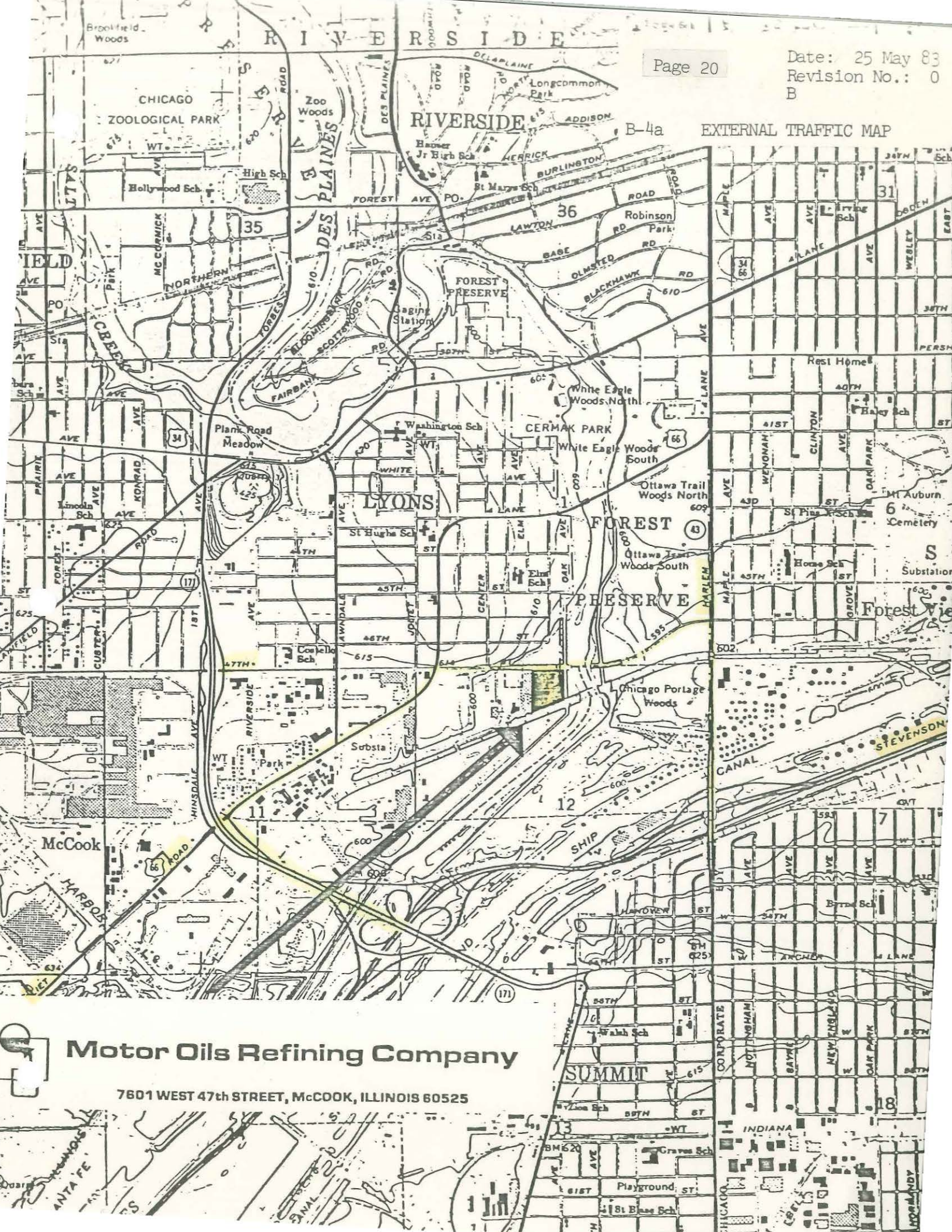
Access to Interstate 55 is approximately 1.2 miles via 47th Street and Harlem Avenue; and 1.25 miles via 47th Street, Joliet Road and 1st Avenue. I-55 is south of the plant.

Motor vehicle traffic inside the plant is confined to a one-lane loop and a central staging area near the entrance. Trucks are kept in the staging area until the load/unloading site is clear. The estimated volume of traffic inside the plant is 16 trucks per 24 hour period during the week, and approximately 8 trucks per 24 hour period on the weekend. The road's load-bearing capacity is 6 tons per square foot. There are no traffic signals inside the plant, and the speed limit is 15 MPH. The access road surfacing is gravel, dry and coarse, packed and confined. A plot plan with the traffic pattern is attached.

Rail traffic enters and leaves the plant on a spur at the southwest corner of the plant. In the plant, one spur runs eastward and is used for parking used oil cars. The second plant spur runs northward and is used for finished product loading. A plot plan indicating these spurs is attached.

Date: 25 May 83
Revision No.: 0
B

B-4a EXTERNAL TRAFFIC MAP



Motor Oils Refining Company

7601 WEST 47th STREET, McCOOK, ILLINOIS 60525

Date: 25 May 83
Revision No.: 0
B

B-4b INTERNAL TRAFFIC FLOW

SECTION C

WASTE CHARACTERISTICS

C-1 HAZARDOUS WASTE CHARACTERISTICS

Used Industrial & Automotive Oils

These oils are collected from gas stations and businesses that use industrial machines or have truck or automobile fleets. Motor Oils Refining Company stores these oils for recycling. These used oils are not ignitable and typically have a viscosity of 100-300 SSU at 100°F. These used oils are hazardous based on their characteristic of high levels of leachable lead according to the E.P. Toxicity test (EPA Hazardous Waste Number D008). Lead has been determined to be a toxic contaminant, therefore, causing these used oils to be hazardous. Refer to Attachment I for a laboratory report detailing the chemical and physical analysis of a representative sample.

/dmg

05/24/83

ATTACHMENT I

C-1a

TYPICAL LABORATORY REPORT

Motor Oils Refining Company
7601 W. 47th St.
McCook, Il. 60525
(312) 442-6166

Laboratory Analysis Report

No:

DATE RECEIVED

SAMPLE Typical Used Industrial and Automotive Oil

SOURCE Tanks 100 and 101

DESCRIPTION

DATE SAMPLED

SAMPLE #				SAMPLE #			
( ) GRAVITY API				(X) SPECT. P.P.M.			
(X) FLASH °F	250			( ) SILVER	0		
( ) FIRE °F				( ) SODIUM	133		
(X) VIS @ 100	178			( ) ZINC	637		
(X) VIS @ 210	47.71			( ) COPPER	38		
(X) V. I.	141			( ) ALUMINUM	86		
( ) ASH SO_4 %				( ) BARIUM	52		
( ) SULFUR %				( ) NICKEL	2		
( ) POUR ° F				( ) CHROMIUM	14		
(X) BS & W %	6.0			( ) CALCIUM	824		
( ) WATER %				( ) IRON	255		
( ) COLOR ASTM				( ) SILICON	91		
( ) PH				( ) TIN	26		
( ) T.A.N./NEUT. NO.				( ) LEAD	635		
( ) T.B.N.				( ) PHOSPHORUS	844		
( ) BENZ. INSOL %				( ) BORON	6		
( ) PENT. INSOL %				( ) MAGNESIUM	100		
( ) ANTIFREEZE GLYCOL				( ) VANADIUM	0		
( ) FUEL DILU. %				( ) MOLYBDENUM	6		
( ) CONRADSON CARBON				( ) MANGANESE	32		
( ) SAP. NO.				( ) CADMIUM	0		
(X) PCB (P.P.M.)	0			( ) TITANIUM	0		

C-2, 2c

MOTOR OILS REFINING COMPANY

SUBJECT: Waste Analysis Plan

Currently, the Motor Oils Refining Company generates hazardous waste and accepts another hazardous waste for treatment and storage. They accept and store used industrial and automotive oils for recycling, via re-refining them back into lube oils. Re-used oil is hazardous based on its characteristic of high levels of leachable lead according to the E.P. Toxicity test. The plant periodically generates a hazardous waste, which is the tank bottoms sludge. It is generated whenever the hazardous waste oil storage tanks are taken out of service for cleaning. This may not occur every year because of the irregular schedule for tank cleaning. This sludge is also hazardous based on leachable lead.

Table 1 lists wastes, their required tests, and the frequency of testing for used oils the plant receives and wastes the plant generates. The only hazardous wastes are the wastes mentioned in the preceeding paragraph. The remainder are sampled periodically to insure they are not hazardous. The rationale for choosing the test parameters listed in Table 1 is so landfills accepting wastes which the plant generates can handle them in an environmentally acceptable manner.

The rationale for selecting the test parameters for used oil are as follows:

1) The plant will not accept ignitable waste oil.

2) The plant will not accept waste oils too high in water or solids.

3) The plant will not accept used oils containing greater than 50 ppm PCB.

4) Waste oils are segregated based on viscosity.

5) The plant monitors metal levels to determine lead levels and additive levels.

6) All tests performed can be performed quickly with existing laboratory equipment.

The test methods are summarized in Table 2 for each of the various tests performed on our wastes. The wastes will be sampled as sludge samples using a sludge theif or a sampling method described by ASTM D-270. The sample containers are to be cleaned, tagged, and dated in a container that is suitable to hold the sampled waste. The frequency of sampling is specified in Table 1.

/dmg

05/23/83

MOTOR OILS REFINING COMPANY

Table 1

C-2a, 2d

Waste Analysis Plan

Sample	Frequency	Test Parameters
Industrial or Automotive Waste Oil	Every Incoming Load	BS&W (%) *Viscosity (SSU @ 100°F) *Flash Point, COC (°F) *Spectrographic Analysis (ppm) PCB (ppm)
Railroad Waste Oil	Every Incoming Load	BS&W (%) *Viscosity (SSU @ 100°F) *Flash Point, COC (°F) *Spectrographic Analysis (ppm)
Waste Oil Tank Bottoms	Only When Down for Cleaning	E.P. Toxicity Test (Minus Pesticides/Herbicides) Flash Point (Closed Cup) pH (10% Suspension) PCB (ppm)
Floc from Air Flotation Unit (Underground Tank)	Annually	E.P. Toxicity Test (Minus Pesticides/Herbicides) Flash Point (Closed Cup) pH (10% Suspension)
Clay (Filtered)	Annually	E.P. Toxicity Test (Minus Pesticides/Herbicides) Flash Point (Closed Cup) pH (10% Suspension)
Oil/Water Separator Sludge	Only When Down for Cleaning	E.P. Toxicity Test (Minus Pesticides/Herbicides) Flash Point (Closed Cup) pH (10% Suspension)

* When required by Laboratory Manager

MOTOR OILS REFINING COMPANY

Table 2

C-2b Waste Analysis Plan - Test Method

E.P. Toxicity	7.1/EPA SW-846
Separation Procedure	7.2/EPA SW-846
Structural Integrity Procedure	7.4/EPA SW-846
Arsenic	8.51/EPA SW-846
Barium	8.52/EPA SW-846
Cadmium	8.53/EPA SW-846
Chromium	8.54/EPA SW-846
Lead	8.56/EPA SW-846
Mercury	8.57/EPA SW-846
Selenium	8.59/EPA SW-846
Silver	8.60/EPA SW-846
Flash (Liquid)	ASTM D-93-79
Ignitability (Solid or Semisolid)	Proposed ASTM E-502
pH	5.2/EPA SW-846
Corrosivity Toward Steel	5.3/EPA SW-846
BS&W	ASTM D-1796
Viscosity @ 100°F	ASTM D-445
Flash (COC)	ASTM D-92
Spectrographic Analysis	Emission Spectrograph
PCB	Gail B. Copland & C. Steven Gohmann, "Improved Method for Polychlorinated Biphenyl Determination in Complex Matrices", Environmental Science & Technology, Vol. 16, No. 2, 1982.

NOTE: EPA SW-846 - Test Methods for Evaluating Solid Wastes, 1980.

/dmg
05/23/83

C-2f Ignitable, Reactive, Incompatible Wastes

Used oil meeting the criteria of being ignitable, reactive, or incompatible are not accepted by this facility. Determination of these parameters is accomplished during the screening of samples from new generators and through sampling of each incoming load when required by Laboratory Manager.

SECTION D

PROCESS INFORMATION

D-1 CONTAINER MANAGEMENT

A very small percentage of used oil is received in containers (drums). A still smaller portion of this material is used crank case oil possibly containing lead.

Immediately upon receipt of any drums in the plant they are either emptied by paving into oil collection sumps or pumped into a small tank truck. In either procedure no more than one inch of residue remains on the bottom of the containers. This is determined intuitively by handling the drums.

Used oil is compatible with unlined steel drums. Some generators, however, occasionally use lined drums, which are also compatible with used oil.

For the above mentioned practice of immediately emptying used oil drums, this facility does not store any hazardous waste in containers.

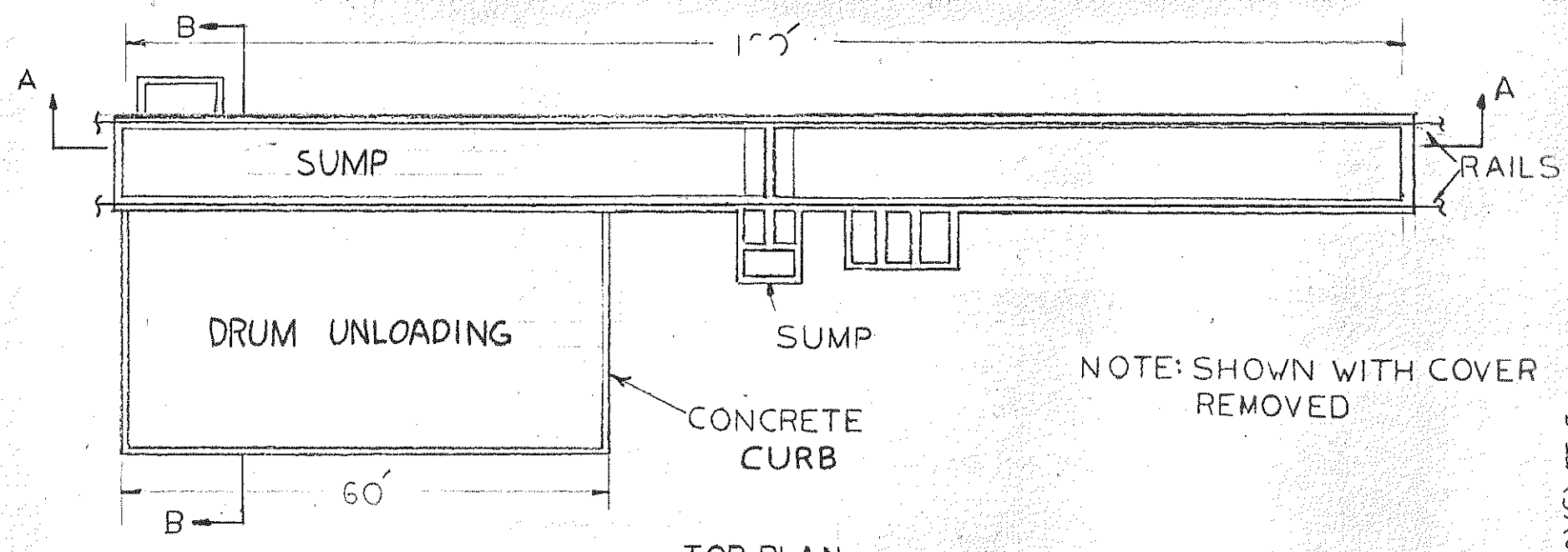
Once emptied, the drums are exempt from regulation under the provisions of 40 CFR 261.7 (b) (1) (i) and (ii), and 261.33. These drums are, however, sent to a local reclaimer for processing.

A drawing of the primary drum unloading facility is attached.

Drums are unloaded from the conveying vehicle and placed on a curbed, 60'x15' concrete slab. The curb prevents both run-on and run off with run off accumulated in the collection sump. The slab will accomodate 210 drums at one time. The maximum truck load is 80, the largest box car holds 105 drums. The concrete slab is sloped to the collection sump to preclude accumulation of liquids.

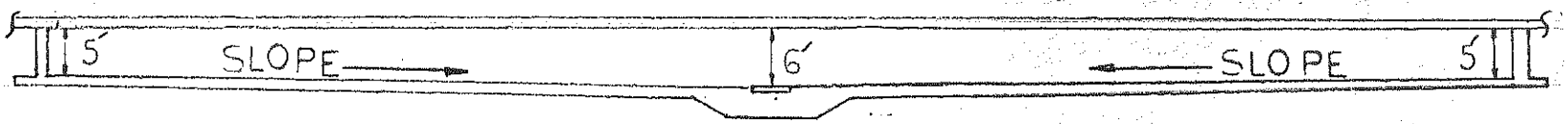
Used oil is dumped, manually, into a sump that will contain 115 K gallons. After being allowed to separate, water is transferred to the API separator and the oil transferred to storage (Tank 101).

The drum unloading facility is located adjacent to the rail spur running along the southern boundary of the plant. (see page 15.20, Plot Plan Drawing)



NOTE: SHOWN WITH COVER REMOVED

TOP PLAN
1"=20'



SECTION A-A
1"=20'

UNLOADING BASIN

Date: 23 Aug 83
Revision No.: 1
D

SECTION B-B
SCALE: 1" = 3'

NOTE: SHOWN WITHOUT RAILS

D-2 TANKS

Two (2) 250 K gallon tanks are used to store lower viscosity used oil, including used automotive crank case oils. These tanks, numbered 100 and 101 were designed to the following specifications:

Design Specifications	Tank 100	Tank 101
Nominal capacity	250 K gal.	250 K gal.
Height to top of shell	36' 0"	36' 0"
Diameter, inside	35' 0"	35' 0"
Conical roof slope	1-3/4 to 12	1-3/4 to 12
Material of Construction	CS ASTM A 283C	CS ASTM A 283C
Floor Thickness	1/4"	1/4"
Wall, roof thickness	3/16"	3/16"
Construction Specification	API 650	API 650
Venting	Atmospheric	Atmospheric
Internal Pressure	Atmospheric	Atmospheric

Sketches of the tanks including piping, vents, tank level guages and access ways are attached.

Foundations

Both tanks are emplaced on a six (6) inch bed of dry sand with an estimated load bearing capacity of 2 Tons/ft^2. The sand was spread over a dry, hard clay base with an estimated load bearing capacity of 3.5 Tons/ft^2. The bottoms of the floors are coated with pitch to prevent corrosion.

The maximum calculated load of a full tank is 1.034 Tons/ft^2.

D-2 TANKS

Corrosion

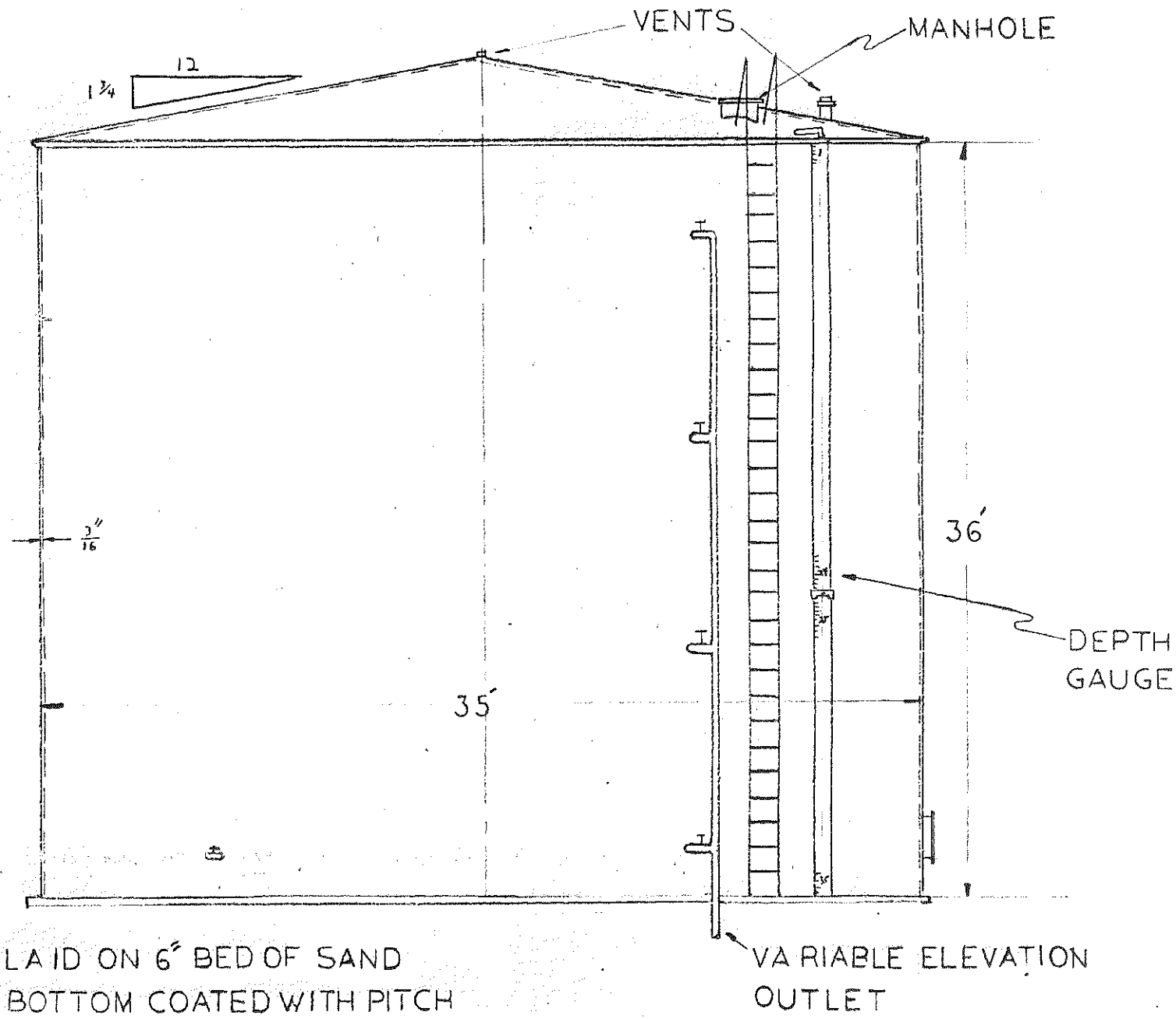
Signs of corrosion will be noted daily by the shift supervisor. These signs include leaking seams or bases, or external oxidation of tank walls.

Used oil is compatible with mild steel and causes minimal corrosion. However, when a tank is taken out of service, internal visual inspections will be made by the Operations Manager, Production Superintendent, Plant Engineer and Shift Supervisor. The tank walls, roof and the bottoms will be inspected for signs of corrosion. Corrosion may include oxidation, wall thinning and pitting. The area around welded seams are more likely to show signs of corrosion. There is no quantified internal inspection schedule. Typically tanks are taken out of service when a problem develops or when the sludge layer has increased to the level where it is difficult to feed out of the tank.

Tank Feeding System

The attached Process Flow drawing is a simplified sketch of our loading/unloading operations. Both the loading & unloading operations are Operator regulated. Should a problem develop, the Operator will stop the unloading operation by shutting down the unloading pump. If a problem exists in a storage tank, the contents of the tank will be transferred to the other storage tank. If one tank is out of service and a problem develops with the other tank, the plant will discontinue receiving used oil and transfer the contents to other available tanks (i.e. diesel engine oil tanks) to temporarily store the used oil. Once the problem is the temporary storage tanks will be cleaned and put back into their original service.

D-2a(1) Profile Tanks 100, 101

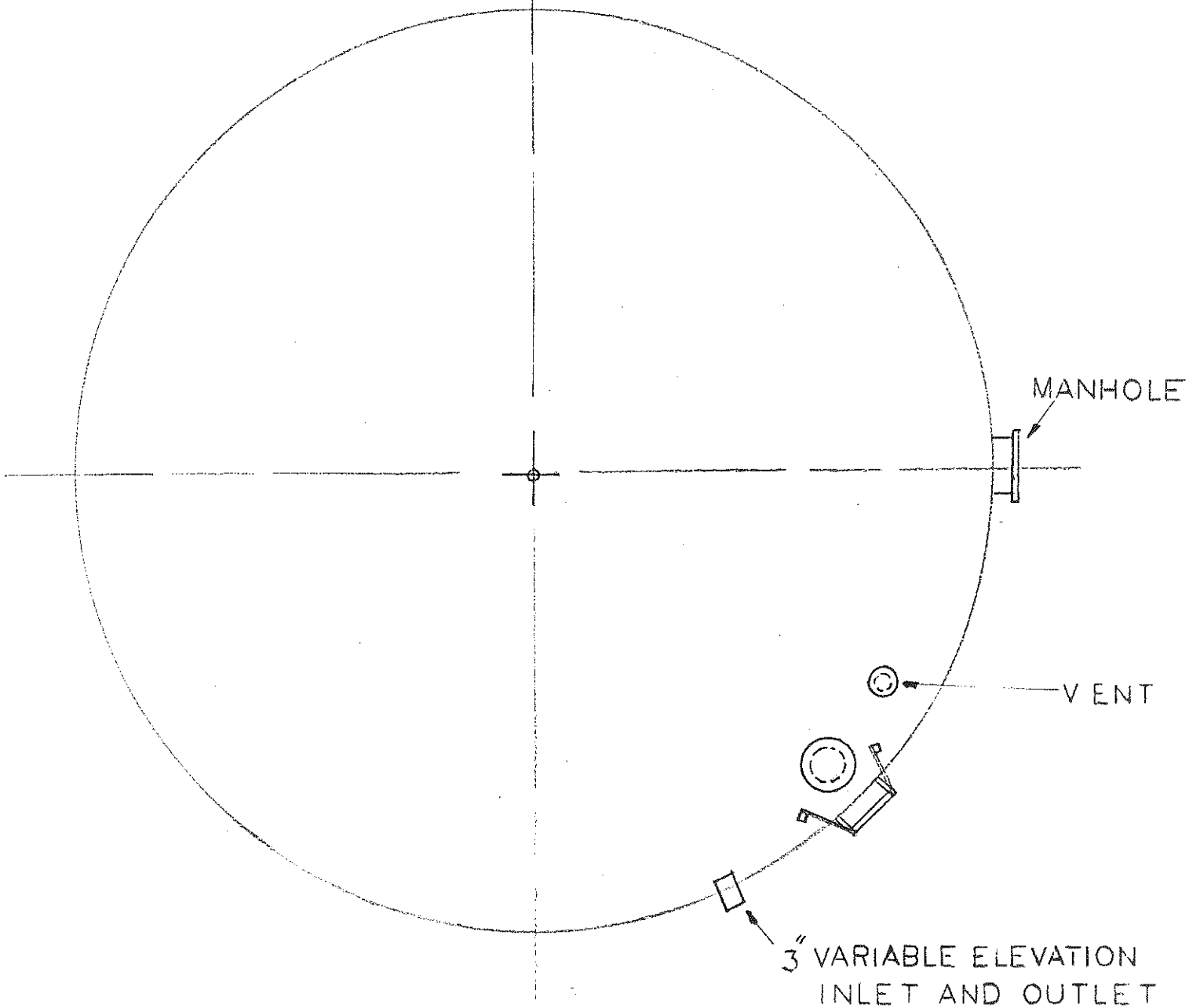


CONSTRUCTION:
API 650
MATERIAL:
A 283 C

FOUNDATION: LAID ON 6" BED OF SAND
BOTTOM COATED WITH PITCH

D-2 a (2) PLAN VIEW: TANK 100

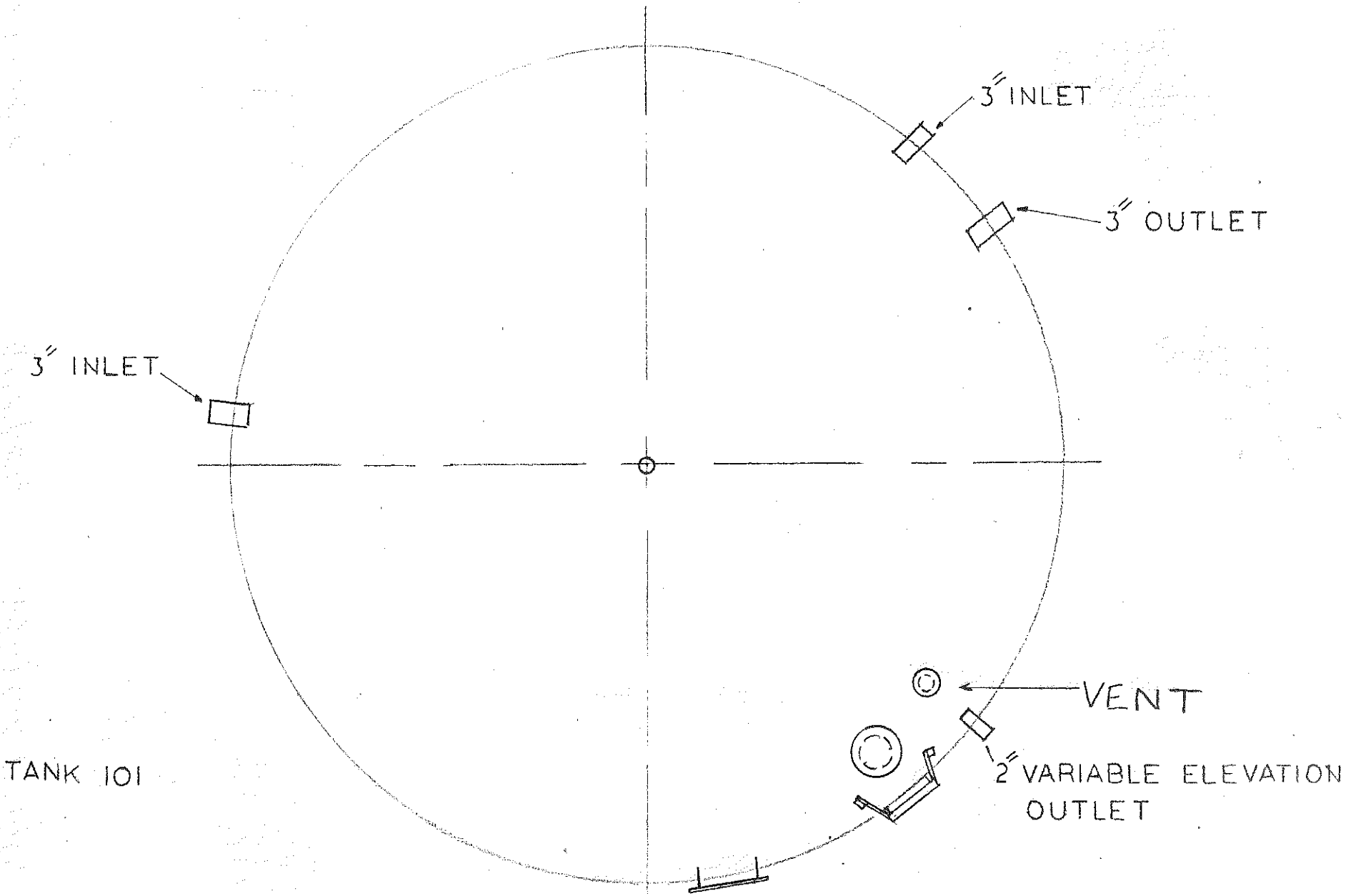
Date: 25 Mar 83
Revision No. 0
D

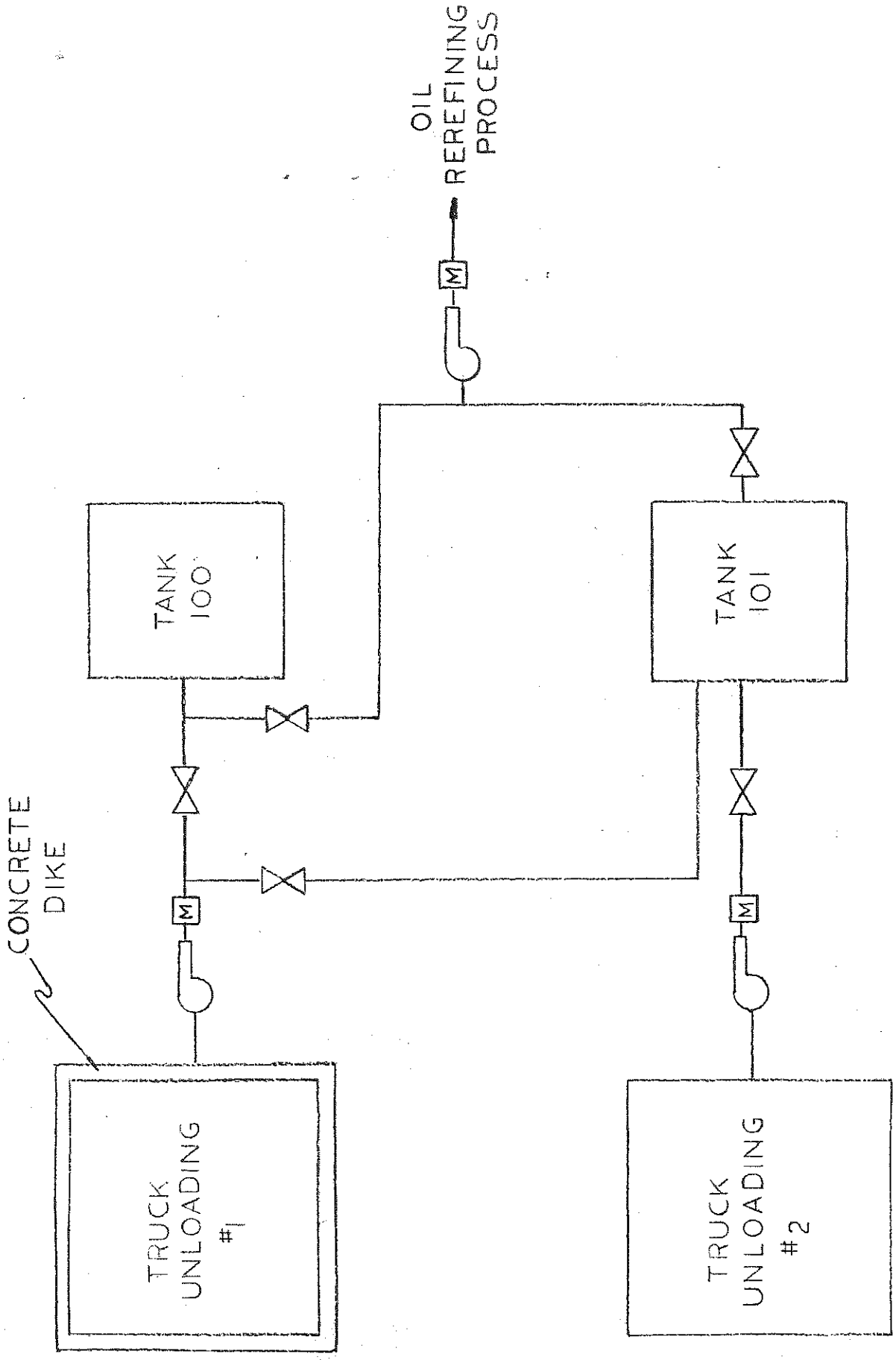


TANK 100

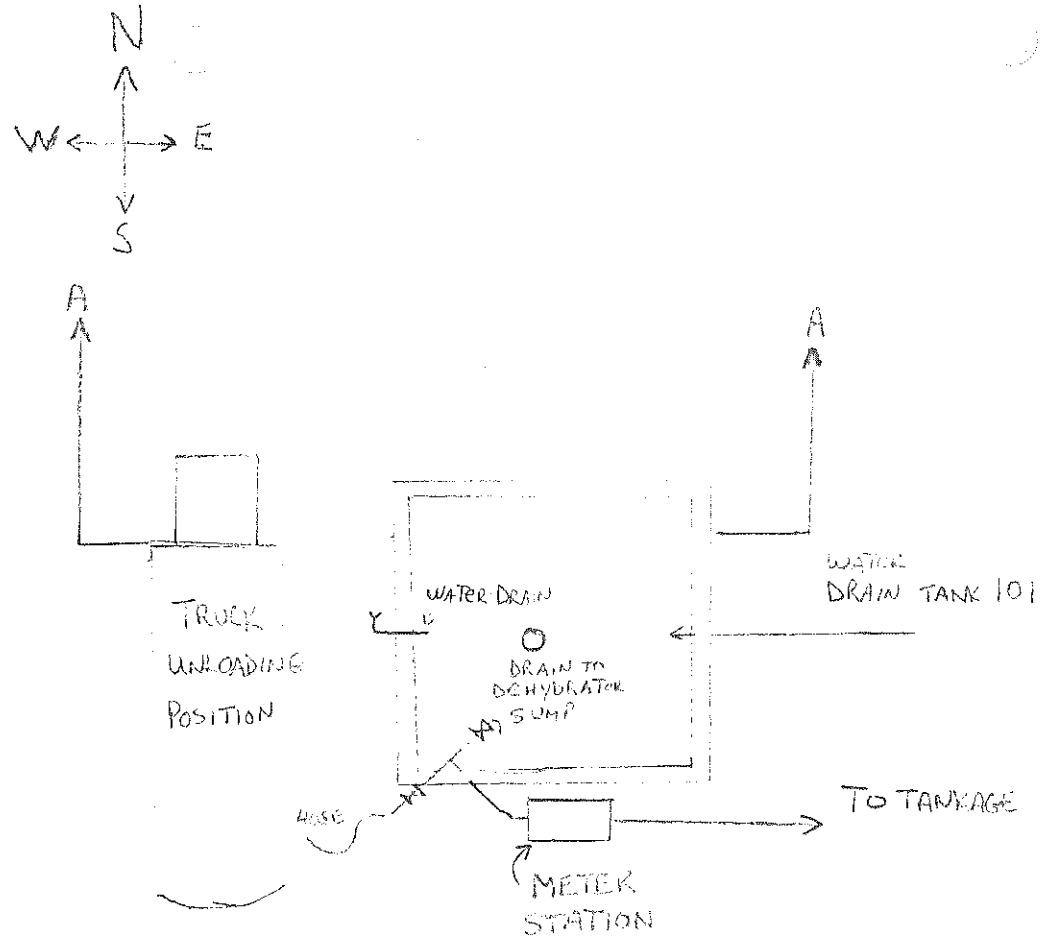
Date 23 Aug 83
Revision No 1
D

D-2 a (3) PLAN VIEW: Tank 101



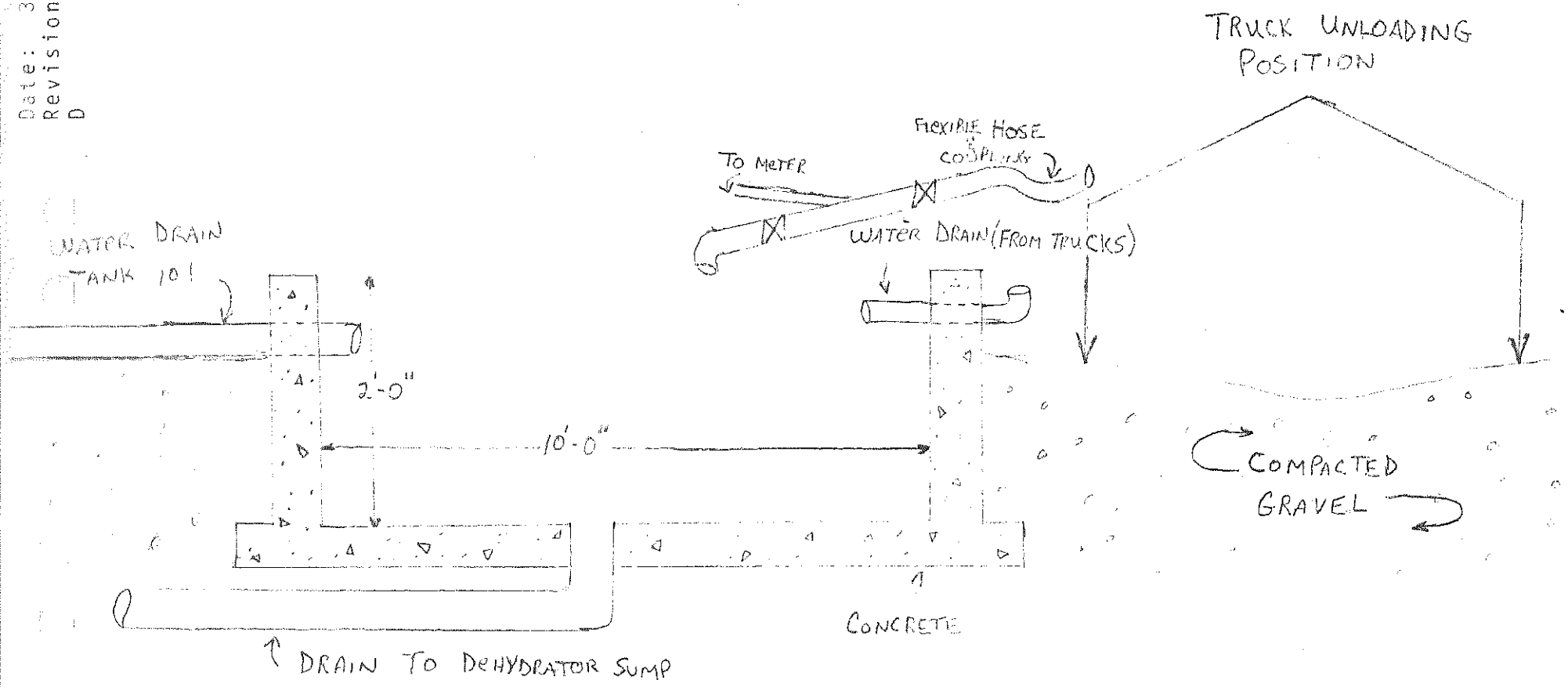


FLOW DIAGRAM FOR STOCK DRAININGS



RAIL SPUR - SOUTH BRANCH

Date: 30 Dec. 83
Revision No.: 0
D


TRUCK UNLOADING POSITION
FLEXIBLE HOSE
TO METER
WATER DRAIN (FROM TRUCKS)
WATER DRAIN TANK 10!
2'-0"
10'-0"
COMPACTED GRAVEL
CONCRETE
DRAIN TO DEHYDRATOR SUMP

SECTION A-A

SECTION F

PROCEDURES TO PREVENT HAZARDS

SECURITY

F-1

During normal operations the plant runs 24 hours/day, seven days per week. The Shift Supervisor on duty is responsible for plant security. Because the plant area is small (6.6 acres), the entire plant perimeter is observed during his rounds checking process equipment. He is assisted by the operator on duty during normal operations.

Truck arrivals and departures are monitored through the Operations office during normal business hours. Drivers report to the office for unloading instructions. The Shift Supervisor approves the shipment for unloading and releases the driver when unloading is complete. At night, drivers report directly to the Shift Supervisor for unloading and release.

During infrequent shut down periods, an employee is scheduled to be physically at the plant specifically for security purposes. Round-the-clock (24 hour per day) coverage is achieved in this manner. During these periods access gates are closed and locked. No traffic is allowed into or out of the plant.

The plant is completely enclosed by an eight (8) feet high cyclone fence topped with barbed wire. The required "Danger" signs are posted at the two entrances to the plant. Additional "Restricted Area" signs are placed at frequent intervals along the fence perimeter to further discourage fence climbers.

F-2a General Inspection Schedule

Type Equipment	Frequency
Safety and Emergency Equipment	Monthly
Process Equipment	Continuous
Storage Tanks	Daily

Safety Equipment Inspection Criteria

1. Fire Extinguishers: Check to insure extinguisher is fully charged by indicator. Hose is not deteriorated nor plugged.

2. Fire Extinguishers - 2 wheel: Check to insure unit is charged with dry chemical; nitrogen tank is full; hose is not deteriorated, kinked, or plugged.

3. Fire Hoses: Check to insure hose is not deteriorated or excessively frayed, and is connected to water source.

4. Sprinkler Systems: Check to insure water pressure gage (inlet) indicates 45-55 psig.

5. Fire Monitors (Water Turret Nozzles): Turn on to test operation; look for broken parts in traversing mechanism or nozzle.

6. Fire Blanket: Check for deterioration or dry rot.

7. Safety Showers and Eye Wash Stations: Turn on to check proper operation.

8. Portable SCBA: Check to insure air cylinder is full; mask is clean and serviceable; hoses are not deteriorated. Turn on, briefly, to insure proper operation.

9. Air Masks for Large Breathing Air Bottles: Check to insure mask is clean and serviceable; hoses are not deteriorated; regulator is present. Connect mask to air bottle and turn on, briefly, to check for proper operation.

10. Fire Alarm: Do not test. This unit is tested by ADT on a monthly basis.

Table 1

F-2a(1)

Safety Equipment Inspection

Month & Year _____

Item	Location	Condition
Fire extinguisher	Laboratory	
Fire extinguisher	West side of office building	
Fire extinguisher	East side of warehouse	
Fire extinguisher	South tracks	
Water turret nozzle	South of old dehydrator	
Sprinkler system (localized)	Blending building	
Fire hose	Blending building	
Fire extinguisher	Blending Building - North Wall	
Sprinkler system (deluge)	Filter house	
Sprinkler system (deluge)	Unit	
Fire extinguisher	Unit (Boiler room west wall) (Boiler room north wall)	
Fire extinguisher	Unit - 1st Floor	
Fire extinguisher	Unit - 2nd Floor	
Fire extinguisher	Unit - 3rd Floor	
Fire extinguisher	Unit - 4th Floor	
Fire extinguisher	Unit - 5th Floor	
Fire extinguisher	T-1 pump house	
Fire extinguisher	T-4 pump house	
Fire extinguisher-2 wheeler	North wall T-1 pump house	
Fire hose	Outside east wall clay room	
Water turret nozzle	East fence near tk. 114	
Fire extinguisher	South entrance to shop	
Fire blanket	Near time clock	

Date: 25 May 83
Revision No.: 0
F

Table 1

Safety Equipment Inspection

Month & Year _____

Item	Location	Condition
Safety shower	South of agitators	
Safety shower	Outside green house - North end	
Safety shower	Blending Building - South end of dock	
Portable self contained breathing apparatus	Inside equipment cage area	
Air masks (2) for big air bottles	Maintenance area	
Fire alarm	Outside lab door	

Inspectors
Supervisor _____
Union Representatives _____

_____

Remarks:

F-2b, 2c

MOTOR OILS REFINING COMPANY

Subject: Plant Inspection Plan

The Federal Government, under the EPA, has promulgated regulations concerning hazardous waste management in accordance to the Resource Conservation & Recovery Act (commonly called RCRA). These regulations state that tanks that contain hazardous waste must be visually inspected once a day to ensure that the tank is being operated correctly.

The only possible hazardous waste storage tanks in the plant (according to EPA definitions) could be the waste oil storage tanks. The waste oil from industrial uses and crankcase drainings are hazardous. Diesel engine lube oils are not considered hazardous and hence are not subject to inspection. Also, small quantities of sludge constantly collects in these tanks while they are active. If these industrial waste oil tanks (tanks 100 and 101) are ever taken out of service, the plant would generate a hazardous waste sludge at that point. If the plant holds this sludge for more than 90 days, the tanks would be considered storage tanks for the sludge.

Tanks 100 and 101 must be inspected since they store hazardous used oil. The Shift Supervisor and the operator must insure that there is sufficient volume remaining in the tanks to prevent overfilling prior to unloading any container into it. Since the tanks are vented to the atmosphere and there is no heating capability, over pressure and thermal expansion do not cause any problems. Pressure and temperature guages are not installed.

In addition, the Shift Supervisor is required to make a daily inspection. This inspection will include measuring the levels daily by taking readings from the level floats. Also signs of corrosion, either on the line connections, seams, bases of the tanks, or on the waste oil unloading pumps, must be noted on the inspection. The area on the other side of the dike, by the storage tanks, must also be inspected for erosion of the dike or dead vegetation. Also the waste oil unloading pumps and the agitator loading pump must be inspected to determine if they are operative.

Whenever tanks 100 or 101 are opened for cleaning or any other reason, the interior is visually checked for corrosion by the Operations Manager, Plant Superintendent, Plant Engineer, and Shift Supervisor on duty.

All these observations, along with additional comments, will be recorded on a simple check sheet (Attachment I) and signed by the supervisor daily. If there are no unusual problems, check (✓) the sheet and sign it. If there is a problem, mark (0) and explain it in the comment section. All problems must have a work order issued to rectify the situation.

ATTACHMENT I

F-2b(2), 2c, 2d INSPECTION OF WASTE OIL STORAGE TANKS

Month & Year _____

Date	Level(Outage), Ft. In. Tk 100	Tk 101	Problems (✓or 0)	Signature	Comments
1					
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					
1					
14					
15					
16					
17					
18					
19					
20					
21					
22					
23					
24					
25					
26					
27					
28					
29					
30					
31					

NOTE: Inspect for corrosion of lines, seams, and surrounding dike. Also check if waste oil unloading pumps and agitator loading pump are operative. If okay, mark (✓), if not, mark (0) and explain in comment section. Use back of sheet if necessary.

F-3

F-3 Waiver of Preparedness and Prevention Requirements

The applicant does not wish to request a waiver of the preparedness and prevention requirements under 40 CFR 264 Subpart C. Requirements of this Subpart are primarily addressed in Section D, Section F, and Section G of this application.

F-3a Equipment Requirements

Internal and external communications, emergency equipment, and fire control equipment are discussed in Section F and Section G.

F-3b Aisle Space Requirements

Aisle Space requirements are not applicable to this facility.

Preventive Procedures, Structures, and Equipment

F-4a Loading/Unloading Operations

Two (2) unloading stations are in service for transferring used oil from tank trucks to storage tanks (100 and 101). Flexible connections are made from the tank truck's manifold to the plant piping system. To minimize spillage, dry-break hose connections are made at the truck manifold. After unloading, hoses are drained into sump which is also pumped into the storage tank.

Used oil is transferred from storage to the process through the Agitator Loading Pump and meter. All piping in this transfer is solid, with no opportunity for spillage.

Accidental spills are contained in an improvised dike area. The improvised dike is constructed by the plant labor force from clay and gravel in the vicinity of the spill. The plant tank truck is driven to the site and, using its own pump's suction, transfers the oil into its tank. It then discharges the oil into the proper storage tank. The plant labor force then picks up the clay and gravel and it is removed to an approved land fill.

F-4b Runoff

All runoff is collected in drainage sumps around the plant. It then flows by gravity or is pumped to the water treatment facility. Oil in the runoff is separated from the water in an API Separator and is recycled to storage.

F-4c Water Supplies

Ground water contamination is prevented by eliminating the discharge of hazardous materials on to unprotected ground. The plant is diked around its entire perimeter as depicted on the plot plan (page 15.20) and topographic survey (page 16.10). Selected areas, specifically the No. 1 unloading station, the Drum Unloading Area, and the Waste Hopper area by the filter house, are concrete paved (see Plot Plan, page 15.20)

F-4d Equipment and Power Failure

In the event of a power interruption, a 30 KW emergency generator maintains the operation of one steam boiler. The steam is used to maintain inert atmospheres in process equipment and to keep process lines and storage tanks from freezing and rupturing.

F-4e Personnel Protection Equipment

All personnel are issued uniforms, hard hats, protective gloves, aprons, safety glasses, and face shields. The hard hats, protective gloves, aprons, safety glasses and face shields are purchased to meet appropriate ANSI Standards (which meet OSHA requirements). All employees have been instructed on the potential hazards of handling used oil.

HANDLING PRECAUTIONS

F-5b, 5e Ignitable, Reactive, Incompatible Wastes

Used oil with properties of being ignitable, reactive, or incompatible are not accepted at this facility. The Quality Control Laboratory screens all incoming loads prior to unloading.

Loads of used oil received after normal business hours are screened by the Shift Supervisor on duty. Questionable loads are held until the next business day.

SECTION G

CONTINGENCY PLAN

Motor Oils Refining Company

September 15, 1981

G-1

SPILL PREVENTION CONTROL & COUNTER MEASURE PLAN

Motor Oils Refining Company property is diked to prevent spills in the plant area from flowing on the ground surface outside of the plant area. The dike is 8" thick, has a minimum depth of 48" below ground level and is at the level of 51.00 feet elevation. The volume capacity of space within this dike has been calculated at 5.5 million gallons. The total volume capacity of all tanks and reactors on the plant is 2.5 million gallons. All of the tanks are within the diked area and, therefore, are protected.

In the event of oil spills on the plant premises, clean up is to be accomplished without delay, utilizing water wash of the area to facilitate the movement of spilled oil and prevent the oil from soaking into the ground. The overall plant grading has been designed to route oil and water to low points equipped with sump pumps to move the oil and water into a separator tank. The water phase is transferred to an API oil/water separator for treatment before discharge to the Metropolitan Sanitary District of Chicago. This water must meet their requirement as stated in Appendix B of the MSDGC Sewage and Waste Control Ordinance (see attachment "A"). The oil phase is put back into our re-refining process.

These procedures must be followed in the designated areas.

I. West of the Railroad Track

The spill area is to be water-washed immediately, with the material being channeled to a low point for removal by a pumper truck, portable sump pump, or channeled to a stationary sump pump for transfer to an oil/water seperator tank. Also there is an underground drainage system that automatically drains spills and surface water to the sump area.

II. Remaining Plant Areas

Any other spill area in the plant premises is to be water washed and the material drained to one or more of the four sump areas for transfer to an oil/water separator. Where deemed expedient, the major portion of a spill shall be removed by pumper truck and the remainder shall be washed down with water and channeled into the sump pump area.

7601 West 47th Street McCook, Illinois 60525

General Office: Chicago (312) 242-2252 Suburban (312) 788-9017 Plant: Chicago (312) 242-2306 Suburban (312) 442-6166

In the event of an oil spill where the material reaches the ground surface outside of the plant area, or there is any indication that the spilled material cannot be contained within the plant area, the designated U.S. EPA district office in Chicago is to be notified immediately. In the event any oil storage tank or oil processing vessel develops a leak which cannot be immediately controlled to prevent spillage of substantial volumes of material (1,000 gallons or more), even though the material may be contained within the diked perimeter of the plant, the same telephone notification is to be made.

The telephone number of the U.S. EPA district office located at 1819 West Pershing Road, Chicago, Illinois is 353-6188.

III. Hazardous Waste Management And Spill Response

Hazardous wastes, as defined by the Resource Conservation and Recovery Act (RCRA), shall be handled in accordance to the RCRA contingency plan. This plan, along with the appropriate responses for emergencies, is the attached Annex A to the Spill Prevention Control and Counter Measure Plan.

T. P. O'Connell

att.
(Plot Plan)

I hereby state that I have reviewed above SPCC plan, have examined the facility and, being familiar with the provisions of this part, attest that subject SPCC plan has been prepared in accordance with good engineering practices.

ATTACHMENT 1

G-2,3,4,6,7,8

RCRA Contingency Plan

Plant EPA I.D. Number: ILD 000646786
Hazardous Waste Generating, Storage, and Treatment Facility

I. General Plan Of Action

In the event of any emergency involving the handling of RCRA defined hazardous wastes, the following steps must be taken.

A. Notification

1. Local authorities.

   a. In case of fire (McCook Fire Dept.) 447-1235 or direct alarm.

   b. In case of injury

      1. Ambulance/Police (McCook) 447-1231
      2. Community Hospital(LaGrange) 352-1200
      3. Dr. Slezak 325-8225

2. Plant authorities

   a. RCRA Emergency Coordinator
      Brian D. McEwan Work 442-6166 ext. 10
      Home Non-responsive

   b. Alternate Coordinator
      Thomas A. Hrastich Work 442-6166 ext. 7
      Home Non-responsive

   c. In case of implementation of the contingency plan he must notify the National Response Center (800-424-8802). If there is a release into the river, the Coast Guard must be alerted (353-8064). Also a written report must be filed with The Regional Administrator within 15 days.

B. Arrangement with Local Authorities

All the above local authorities have either formally or informally agreed to help with any plant emergencies. The mentioned fire department and police are designated as primary emergency authorities. All other local authorities that may get called in by the primary authorities, will act as support to the primary authorities.

II. Specific Plan of Action

Currently, the only hazardous wastes that are stored on site are waste oil and its tank bottoms. These wastes are non-flammable, but are hazardous based on its characteristic of leachable lead according to the E.P. Toxicity test.

A. Equipment:

Nearby the waste oil tanks is a supply of water for fighting fires either directly or indirectly associated with the tank. Also there are fire extinguishers nearby. Emergency and safety equipment are described in Tables 1 and 2. This equipment receives a monthly inspection.

Clay and gravel is readily available for making temporary dikes in the event of a spill. The plant or an outside contractor can use its vacuum trucks for picking up a spill.

B. Procedures:

In the event of an actual or threatened spillage from the waste oil storage tanks, every effort should be taken to contain and minimize the volume of lost material. First the waste oil unloading pump must be shut down to stop any waste oil from entering the tank. If a tank is leaking, the agitator loading pump must then transfer the contents of that tank to other available waste oil tanks to minimize the spillage. A temporary dike must be installed for spill containment. Vacuum trucks can be used to pick up the spill for transportation to an approved landfill or an available waste oil tank.

III. Evacuation Routes

There are two entrances to the plant. The main entrance is off of 47th Street, while the other is by the tracks in the southwest corner of the plant. In case of fire or flood where evacuation may be necessary, office personnel will be evacuated immediately. Essential plant personnel must shut down the plant in a safe and efficient manner and then proceed with evacuation if necessary.

All evacuation should take place out the main entrance to the plant. If this exit is blocked because of fire, then employees must proceed to the railroad entrance gate (southwest corner) and proceed down the tracks until they reach safety.

A plant public address system is available to announce the evacuation and direct personnel to safety.

IV. RCRA Emergency Coordinator

Coordinator: Brian D. McEwan
Plant Engineer
Phone: 442-6166 Ext. 314
Home Address: Non-responsive
Home Phone:

Alternate: Thomas A. Hrastich
Operations Manager
Home address:

Home phone:

Phone 442-6166 Ext. 7

Non-responsive

V. Upon implementation of this plan the Emergency Coordinator or alternate will prepare and issue reports as required by local, state and federal regulations. Copies of the emergency reports will be kept in the plant operations office.

APPENDIX B

to the

SEWAGE AND WASTE CONTROL ORDINANCE

The following are the maximum concentrations acceptable for discharge of sewage, industrial wastes, or other wastes into the sewerage system under the jurisdiction of The Metropolitan Sanitary District of Greater Chicago:

WASTE OR CHEMICAL	Concentration mg/l
Boron	1.0
Cadmium	2.0
Chromium (Total)	25.0
Chromium (Hexavalent)	10.0
Copper	3.0
Cyanide (Total)	10.0
Cyanide (Readily Released at 150°F and pH - 4.5)	2.0
Iron	50.0
Lead	0.5
Nickel	10.0
Zinc	15.0

pH Range - Not lower than 4.5 or greater than 10.0

Temperature not over 150°F

Any discharge of wastes or waters into a sewer which terminates in or is a part of the sewerage system of the Sanitary District, must not contain the following:

(a) Water or Wastes containing more than 100 mg/l of Fats, Oils or Greases (FOG).

(b) Liquids, solids or gases which be reason of

APPENDIX B

their nature or quantity are sufficient to cause fire or explosion or be injurious in any other way to the sewerage system or to the operation of the water reclamation plants.

(c) Noxious or malodorous liquids, gases or substances which either singly or by interaction with other wastes are sufficient to create a public nuisance or hazard to life, to cause injury or to prevent entry into the sewers for their maintenance and repair.

(d) Water or wastes containing toxic substances in quantities which are sufficient to interfere with the biological processes of the water reclamation plants.

(e) Garbage that has not been ground or comminuted to such a degree that all particles will be carried freely in suspension under conditions normally prevailing in public sewers, with no particle greater than one-half inch in any dimension.

(f) Radioactive wastes unless they comply with the Atomic Energy Commission Act of 1954 (68 Stat. 919 as amended and Part 20, Sub-Part D--Waste Disposal, Section 20.303 of the Regulations issued by the Atomic Energy Commission, or Amendments thereto).

APPENDIX B

(g) Solid or viscous wastes which cause obstruction to the flow in sewers or other interference with the proper operation of the sewerage system or water reclamation plants, such as grease, uncomminuted garbage, animal guts or tissues, paunch manure, bone, hair, hides, fleshings, entrails, feathers, sand, cinders, ashes, spent lime, stone or marble dust, metal, glass, straw, shavings, grass clippings, rags, spent grain, waste paper, wood, plastic, gas, tar, asphalt residues, residues from refining or processing of fuel or lubricating oil, gasoline, naptha, and similar substances.

(h) Liquids or vapors having a temperature higher than 150°F, at the point of entrance into a public sewer.

(i) Waters or waste containing substances which are not amenable to treatment or reduction by the sewage treatment process employed or are amenable to treatment only to such degree that the water reclamation plants' effluent cannot meet the requirements of other agencies having jurisdiction over discharge to the receiving waters.

(j) Excessive discoloration (such as but not limited to dye waste and vegetable tanning solutions).

APPENDIX B

(k) Mercury as Hg. Concentrations of Mercury shall not exceed the standards set forth in the Illinois Pollution Control Board Rules and Regulations, Chapter 3, Part VII, Rule 702. (0.0005 mg/l)

APPROVED:

President,
Board of Commissioners,
The Metropolitan Sanitary
District of Greater Chicago

APPROVED as to
FORM and LEGALITY

Principal Assistant Attorney

Attorney

ATTACHMENT "B"

CONTINGENCY PLANNING CHECK LIST

1. Notification and Alerting Procedures

(a) Notification List – Office and home telephone numbers

- Company: (i) Local Management
  (ii) Local Spill Team
  (iii) Regional Management
- Local co-operative members and alternatives
- Local clean-up contractors
- Government – Notification – Federal
  Provincial /State
  Municipal
- Government – Assistance – Federal
  Provincial /State
  Municipal

(b) Reporting Procedures

- What is to be reported and with what urgency
- To whom is it reported
- By whom is it reported.
  Use fan-out call list system to reduce the number of calls any one person must make.
- Method of reporting; verbal – written

. . / 2

2. Specific Analysis of Plant Layout and Operations

- Always assume the worst (e. g. product escapes plant site)
- Where could spill occur
- How much product could be spilled
- Where would spilled product go
- How could it be contained and recovered
- What equipment and manpower would be required Where would they be obtained
- Are specific action steps outlined for the most probable or most serious incidents which might occur

3. Equipment Inventory List

- Identify own on-site equipment and exact location of it
- Identify local co-op equipment, location of it and procedures to obtain
- Identify back-up equipment – nearest company facilities and co-operatives, mobile vans, with procedures to obtain
- Identify equipment or services available from governments
- Obtain written schedule of charges or contracts, in advance, from local contractors for men, materials and equipment, and commitment on availability. Usually most effectively done by local co-op.

. . / 3

4. Equipment Readiness

- Establish routine procedures and responsibility for spill equipment stored on site:

  -inspection
  -maintenance
  -physical presence inventory
  -equipment loaned to others

5. Waste Disposal

- Identify means of disposal of recovered product and contaminated debris

  -location of disposal site
  -method of transport
  -waste disposal contractor

- Means of holding or accumulating product or debris pending disposal

  -open-headed drums
  -load Lugger buckets
  -slop tank

- Obtain approval, preferably in writing, of plans to dispose of recovered product and debris from all appropriate government agencies if other than company facilities are involved

- Consider possibility and consequences of leaching if material is to be buried in ground

Table 1

G-5

Safety Equipment Inspection

Month & Year _____

Item	Location	Condition
Fire extinguisher	Laboratory	
Fire extinguisher	West side of office building	
Fire extinguisher	East side of warehouse	
Fire extinguisher	South tracks	
Water turret nozzle	South of old dehydrator	
Sprinkler system (localized)	Blending building	
Fire hose	Blending building	
Fire extinguisher	Blending Building - North Wall	
Sprinkler system (deluge)	Filter house	
Sprinkler system (deluge)	Unit	
Fire extinguisher	Unit (Boiler room west wall) (Boiler room north wall)	
Fire extinguisher	Unit - 1st Floor	
Fire extinguisher	Unit - 2nd Floor	
Fire extinguisher	Unit - 3rd Floor	
Fire extinguisher	Unit - 4th Floor	
Fire extinguisher	Unit - 5th Floor	
Fire extinguisher	T-1 pump house	
Fire extinguisher	T-4 pump house	
Fire extinguisher-2 wheeler	North wall T-1 pump house	
Fire hose	Outside east wall clay room	
Water turret nozzle	East fence near tk. 114	
Fire extinguisher	South entrance to shop	
Fire blanket	Near time clock	

Table 1

Safety Equipment Inspection

Month & Year _____

Item	Location	Condition
Safety shower	South of agitators	
Safety shower	Outside green house - North end	
Safety shower	Blending Building - South end of dock	
Portable self contained breathing apparatus	Inside equipment cage area	
Air masks (2) for big air bottles	Maintenance area	
Fire alarm	Outside lab door	

Inspectors
Supervisor _____
Union Representatives _____

_____

Remarks:

Table 2

G-5

Safety Equipment Capabilities

Item	Capabilities
Fire extinguisher	Can deliver approximately 15 pounds of dry chemical for extinguishing A B and C type fires. Unit is portable. Unit on two wheels contains approximately 100 pounds of chemical.
Fire hose	Water pressure approximately 35 psig. Hose extends approximately 100 feet. Can deliver approximately 200 gpm of water, for extinguishing most non electrical fires.
Sprinkler system Blending Building	Water pressure approximately 35 psig. Used for fire fighting in enclosed and difficult to reach places. Purpose is used to protect structures and vessels. Sprinklers are individually heat actuated and each nozzle can deliver about 50 gpm of water for extinguishing most non electrical fires.
Sprinkler system Unit and Filter House	Water pressure approximately 35 psig. Used for fire fighting in enclosed and difficult to reach places. Purpose is to protect structures and vessels. Sprinklers are actuated by a broken air transmission line, which will actuate all sprinklers in the system. Can deliver approximately 1000 gpm of water for extinguishing most non electrical fires.
Water turret nozzle	To be used to direct a steady flow of water at a specific area. Turret adjusts up and down and rotates 360 degrees. Meant to aid in fire fighting without utilizing a man to hold it.
Fire blanket	Used to protect personnel from heat and flame exposure especially in the case of an accident or injury.
Safety shower	To be used to wash corrosive chemical off of employees clothes or eyes. To be used in an emergency when spills and splashes of chemicals occur.
Breathing units	Both units to be used when working in a toxic atmosphere or in case of a release of toxic gases. Portable unit supplies approximately 10-15 minutes of air; while larger air bottles can supply two men working for 1/2 to 1 hour.

Table 2

Safety Equipment Capabilities

Item	Capabilities
Fire alarm	To be used to alert plant personnel and the fire department of a fire or some other immediately hazard.

SECTION H

PERSONNEL TRAINING

HAZARDOUS WASTE TRAINING

H-1, 1e RCRA INTRODUCTION & EMERGENCY TRAINING

Introduction

The Resource Conservation and Recovery Act (called RCRA) establishes regulations for the management of hazardous wastes. These regulations set down procedures to handle hazardous wastes properly from "cradle to grave". There are severe civil and criminal penalties for mismanagement and/or non-compliance with the regulations. There are regulations for generators, transporters, and treatment, storage and disposal facilities (TSDF). As hazardous waste moves from "cradle to grave", the generator, transporter, and TSDF are tied together by a manifest which tracks this waste in a step-by-step process.

Treatment, storage, and disposal facilities also have specific regulations for tanks, surface impoundment, landfills, incinerators, etc. For instance, tanks that store hazardous waste must be inspected daily for malfunctions or leaks. These regulations also state that personnel working at a TSDF must be trained in hazardous waste management so that it ensures the facility's compliance with the regulations. At a minimum, personnel must be trained so they can respond effectively to emergencies.

Emergency Training

A contengency plan has been developed for Motor Oils Refining in cas- of emergencies associated with the treatment and storage of hazardous waste. The contingency plan (Attachment 1) outlines the plant's approach to respond to such emergencies. The names and phone numbers of the RCRA Emergency Coordinators are there, as well as actions to take at specific treatment or storage facilities. The RCRA Emergency Coordinator must be called if there is an emergency that could contaminate the groundwater (i.e., a very large spill on land).

If a spill or fire involves a hazardous waste storage tank, the feed to the tank should be shut off or bypassed around the tank. It is preferable to stop the feed automatically versus manually because of the hazard involved. If no automatic valve exists, a remote stop button on a pump (i.e., the waste oil unloading pumps) that is feeding the tank will also work where applicable.

In case of a fire or explosion, unit personnel must immediately sound the alarm which is tied to the fire department and follow it up with a call to the fire department to verify they have received the alarm. Unit personnel will use fire extinguishers, fire hoses, and turrets to fight small fires to contain them and, if possible, extinguish them. Any sprinkler systems must be activated to help extinguish the fires. The contingency plan has a list of emergency equipment, along with their location and capabilities. This equipment will be inspected monthly by a supervisor and a union representative.

For shutdowns of hazardous waste storage tanks, tanks should be cleaned and purged of harmful liquids and gases. If tanks will be entered, all lines to and from the vessel should be blinded off and air induced into the vessel. If not enough oxygen is present to sustain life (approximately 20%), then the tank can only be entered using breathing apparatus.

/dmg

05/17/83

H-1a

MOTOR OILS REFINING COMPANY

Subject: Personnel Requiring Hazardous Waste Training

JOB TITLE	EMPLOYEE NAMES
Operations Manager	Thomas A. Hrastich
Plant Engineer	Brian D. McEwan
Plant Superintendent	Francis J. Lappin
Blending Supervisor	Richard C. Gentry
Shift Supervisors	Otha U. McCoy William J. Nehart Dennis Stribrny Javin Williams
Lead Men	Robert E. Bolisenga Watson Brown Harold Cragher Ellis R. Funchess Wally Sekula Bruce Wollenberg

MOTOR OILS REFINING COMPANY

H-1a(1) JOB DESCRIPTIONS FOR HAZARDOUS WASTE TRAINING

HAZARDOUS WASTE MANAGEMENT FACILITY

The personnel listed in the document titled "Personnel Requiring Hazardous Waste Training" represent all facility personnel that are responsible for handling hazardous waste in the plant. The position descriptions for Operations Manager, Plant Engineer, Plant Superintendent, Blending Supervisor, and Shift Supervisors are included in the following attachments. The position description of Lead Man is the same as Shift Supervisor when the Shift Supervisor is not available. These descriptions represents general responsibilities for each of the positions, and specific duties, which are much more involved, are not listed.

The Operations Manager and Plant Engineer typically have a bachelor's degree in a technical field. They possess problem solving skills and technical competence in understanding process conditions and equipment, along with strong managerial skills.

The Plant Superintendent typically has a college education and have a thorough understanding of the plant's process and equipment. He usually has been promoted within the company based on his technical and/or leadership ability.

The Blending Supervisor, Shift Supervisor, and Lead Men typically have a high school education and have spent some time in operating or maintenance positions. They are usually assigned or promoted to these positions based upon skill level demonstrated in the previous positions. This skill is typically the ability to solve process or maintenance problems, and informally (or formally) lead fellow employees.

The training required for each of the above positions is summarized in the "Hazardous Waste Training Outline."

MOTOR OILS REFINING COMPANY

POSITION DESCRIPTION

TITLE: Operations Manager

REPORTS TO: President

SUPERVISES: Plant Superintendent, Shift Supervisors, Plant Engineer, Blending Supervisor, Laboratory Personnel, Production, Maintenance Workers

BASIC FUNCTIONS: Operate and maintain the McCook Refinery to meet the volume, expense and efficiency requirements of the business. Assist management with operating matters relating to other locations.

SPECIFIC DUTIES & RESPONSIBILITIES:

I. ADMINISTRATIVE

A. Train production and maintenance workers
B. Provide adequate supervision
C. Responsive to company programs on
- Financial objectives
- Safety
- Growth
- Environmental Quality Standards
- Personnel

II. OPERATIONAL CONTROL

A. Operating analysis and programs to maximize
- Yields
- Throughput Volumes
- Cost Control
- Equipment utilization and maintenance

B. Schedule production commensurate with customer needs, raw material balance and plant economy

C. Coordinate operations with laboratory, utilizing
- Material analyses
- Process controls
- Finished product specifications

D. Responsible for protection and maintenance of land, buildings, equipment, and inventories.

MOTOR OILS REFINING COMPANY

POSITION DESCRIPTION

TITLE: Operations Manager - Continued

III. GENERAL ACTIVITIES

A. Assist management in evaluating constructing, and operating facilities acquired or part of CAEP.

B. Coordinate production, maintenance, and other operating matters with all other departments.

Date: 25 May 83
Revision No.: 0
H

POSITION DESCRIPTION

TITLE: Plant Engineer

UNIT: Motor Oils Refining Co.

REPORTS TO: Operations Manager

SUPERVISES: Usually: None; Occasionally: 4(Maintenance)

BASIC FUNCTION: Analyzes plant processes to determine capacity and limitations and implements engineered programs to improve productivity and control.

Specific Duties:

Conducts process evaluations in operations and pollution abatement systems. Develops experimental programs to determine and measure critical parameters and variables. Supervises implementation of the programs and data collection. Prepares reports correlating data and makes recommendations for process improvements. Develops process flow sheets as required.

Works as Project Engineer developing complete design package and cost estimate for capital and major expense projects. Evaluates and specifies equipment and instrumentation. Has responsibility for implementing approved programs within allocated cost.

Acts as Project Manager for engineering projects contracted to outside engineering firms. Coordinates the collection of process data with outside firms. Reviews and approves reports, designs and cost estimates submitted by firms.

Coordinates implementation of the plant maintenance management system. Develops records system to measure and control labor and materials consumption. Trouble shoots plant problems and evaluates alternatives for avoiding recurrence.

Acts as Safety and Loss Prevention Engineer evaluating plant systems with respect to employee safety and major loss prevention.

POSITION DESCRIPTION

TITLE: Plant Superintendent

UNIT: Motor Oils Refining Company

REPORTS TO: Operations Manager

SUPERVISES: Shift Supervisors, Production and Maintenance Workers

BASIC FUNCTIONS: Assist the Operations Manager with administrative and operational control of the plant. Directly responsible for supervision of production workers and others as assigned.

SPECIFIC DUTIES AND RESPONSIBILITIES:

I. Production Supervision:

A. Train and supervise Shift Supervisors

B. Train and supervise production workers.

C. Establish and maintain production parameters and controls on yields and expenses.

D. Establish and maintain reporting systems as required.

II. Assistance to the Operations Manager

A. Assist the Operations Manager in programs relating to training, safety, economy, personnel and environment quality standards maintenance.

B. Coordinate all aspects of production with all other departments and activities.

C. Control and protection of all assets.

D. Function as Operations Manager during the absence of the Operations Manager.

POSITION DESCRIPTION

TITLE: Blending Supervisor

UNIT: Motor Oils Refining Company

REPORTS TO: Plant Superintendent

SUPERVISES: Assigned Blending Operations

BASIC FUNCTION: Supervise blending personnel to accomplish the assigned volume, expense, and efficiency requirements of the operation.

Specific duties:

1. Train new blending employees
2. Accurate and timely reporting of key operating data
3. Responsibilities include supervision of blending personnel as regards the company's policy on:
   - A. Safety
   - B. Economies of operation
   - C. Volumes and yields
   - D. Equipment maintenance
   - E. Pollution control
   - F. Personnel management
   - G. Quality control
   - H. Protection of assets
4. Coordinates with shift supervisor key areas requiring maintenance.
5. Recommends changes in operations to achieve plant's goals.

Date: 25 May 83
Revision No.: 0
H

POSITION DESCRIPTION

TITLE: Shift Supervisor

UNIT: Motor Oils Refining Company

REPORTS TO: Plant Superintendent

SUPERVISES: Assigned shift operations, production and maintenance

BASIC FUNCTION: Supervise production and maintenance workers to accomplish the assigned volume, expense, and efficiency requirements of the operation

Specific Duties:

1. Train new production employees
2. Accurate and timely reporting of key operating data
3. Responsibilities include supervision of shift production and maintenance personnel as regards the company's policy on:
   - A. Safety
   - B. Economies of operation
   - C. Volumes and yields
   - D. Equipment maintenance
   - E. Pollution control
   - F. Personnel management
   - G. Quality control
   - H. Protection of assets
4. Recommends changes in operations to achieve plant's goals.

H-1b, 2

HAZARDOUS WASTE TRAINING OUTLINE

GENERAL

All employees of Motor Oils Refining's plant go through various training programs. Operators and maintenance men are taught the basics about plant safety and emergencies shortly after they hire in, and through a series of monthly safety meetings to provide continuing education. For instance, all employees are taught fire fighting and other hazards of the work environment. Also, management personnel, (Operations Manager, Plant Superintendent, Plant Engineer, and Supervisors) attend various seminars and courses periodically to improve their knowledge and skills. Additionally all groups of employees receive on-the-job continuing education by gaining experience in a wide variety of problems. The hazardous waste training will, for most personnel, re-emphasize prior knowledge plus teach them additional requirements needed to handle hazardous wastes safely and according to RCRA standards.

The training will be given only to management personnel and those that have responsibility for the handling, storage and disposal of hazardous waste. The training will be conducted by the Plant Engineer using site-specific examples of RCRA's training requirements as outlined in Table 1. This training will be done via short classes and/or training memoranda.

Every six months a survey will be taken to update the list of personnel that require training. This way all appropriate personnel will be trained in hazardous waste within six months of their date of employment or new position. Also employees requiring this training will receive an annual training update and review to ensure the plant's compliance with the regulations.

(Table I)

H-1b HAZARDOUS WASTE TRAINING OUTLINE

I. RCRA Basics and Introduction

A. Conduct short classes and/or issue explanatory memos on the legal requirements of RCRA.

B. Describe site-specific examples of hazardous wastes and define what is a "hazardous waste." This will be done by lecture.

C. Describe RCRA plant inspection requirements. This will be done by short classes and/or explanatory memos.

D. Conduct short classes on operation and monitoring requirements imposed on us by RCRA.

II. Manifest System

Conduct short classes and issue logs (for the operating record) on proper filling out and handling of manifests.

III. Emergency Training

A. Conduct short classes and/or issue emergency and contingency planning explanatory memos.

B. Discuss emergency equipment inspection requirements.

C. Conduct short classes and/or issue explanatory memos on the following:

1. Procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment.

2. Key parameters for automatic waste feed cut-off systems.

3. Communication and alarm systems.

4. Response to fires or explosions.

5. Response to ground water contamination incidents.

6. Shutdown of operations.

IV. Continuing Training

Update training annually or as regulations change.

H-1c, 1d TRAINING PERSONNEL QUALIFICATIONS

Training Director

The Training Director is an additional duty of the Plant Engineer. He is educated as a Chemical Engineer. Through experience he is knowledgeable in all facets of plant operations and processes. He has also attended seminars concerned with RCRA and handling hazardous wastes. The incumbent has held the position of Environmental Coordinator at a major oil refinery.

Assistant Training Director

Assistant Training Director is an additional duty of the Operations Manager. He is, also, educated as a Chemical Engineer. Through experience he is knowledgeable in all facets of plant operations and processes. He has attended seminars concerned with RCRA and handling hazardous waste. The incumbent has considerable experience and training as an instructor through the U. S. Army.

SECTION I

CLOSURE PLANS, POST-CLOSURE PLANS AND FINANCIAL REQUIREMENTS

MOTOR OILS REFINING COMPANY

I-1 RCRA CLOSURE & POSTCLOSURE PLANS

RCRA CLOSURE PLAN

For RCRA - defined hazardous waste TSD facilities at the Motor Oils Refining Company - McCook Plant.

EPA I.D. Number ILD 000646786

At this time there are no plans to close any of the facilities listed in the Part A permit application. This plan was prepared to meet the requirements of 40 CFR Part 265, Subpart G, "Closure and Postclosure."

USED OIL STORAGE TANKS AND DRUM UNLOADING AREA

These tanks do not have set lifetimes or preplanned closure dates. Therefore, it is impossible to predict when this might occur. The planned closure procedure would be as follows:

1) Discontinue receiving used oil and empty all drums.

2) Continue processing until used oil inventory is depleted.

3) Remove tank bottoms and sludge from all sumps and dispose of per applicable RCRA requirements. This would be done via vacuum truck, which is locally available.

4) Clean inside of tank with high pressure water and/or cleaning materials (if necessary) using plant equipment and/or locally available tank cleaning firm.

5) Dispose of rinsed material per RCRA requirements through locally available tank cleaning firm.

6) Disconnect lines to and from tank and blind off lines as necessary. Tank is now "non-hazardous."

7) Return empty drums to local reclaimer for processing.

Estimated total time to do items 3-7 is approximately 60 days.

Cost of Closure

Refer to Attachment I for the estimate of the cost to close this facility.

RCRA POSTCLOSURE PLAN

Since all hazardous waste storage tanks will be decontaminated and all contents disposed of, each tank will be considered non-hazardous. Therefore, no postclosure care will be necessary.

ATTACHMENT I

I-4 RCRA CLOSURE COST ESTIMATE - MAY 16, 1983

Description	Cost
Disposal Cost of Waste Oil Tank Sludge	$ 25,000 (1)
Labor to Clean Waste Oil Tanks & Sumps, & Remove Drums	50,000 (1)
Disconnecting & Blending Waste Oil Tanks	15,000
Labor & Disposal Costs to Clean Oil/Water Separator	100,000
Contingency @ 5%	10,000
TOTAL	$200,000

NOTES:

(1) If there is partial closure, the two large waste oil tanks represent 40% each of this cost. The remaining tanks would represent approximately 1% each of this cost.

/dmg

05/19/83

I-1c Maximum Used Oil Inventory

Two (2) - 250 K gallon tanks with the combined capacity of 500 K gallons are dedicated to storing used oils from industrial and automotive sources. Therefore, the maximum inventory that can be stored during the life of the plant is 500 K gallons.

The remaining 2 $\overline{M}$ gallons of plant storage capacity is dedicated to finished base oil, blending oil, additives, and finished product (1.5 $\overline{M}$ gallons); railroad diesel drainings (400 K gallons); and internally consumed fuel oil (100 K gallons).

MORECO Energy, Inc.

REPORT ON FINANCIAL STATEMENTS

YEARS ENDED OCTOBER 30, 1982 AND OCTOBER 31, 1981

CONTENTS

Date: 23 Aug 83
Revision No.: 0
I

Seidman & Seidman | BDO
Suite 2800, 111 East Wacker Drive, Chicago, Illinois 60601 (312) 644-7400
TWX: 910 221-0381

December 11, 1982

MORECO Energy, Inc.
McCook, Illinois

We have examined the balance sheets of MORECO Energy, Inc. as of October 30, 1982 and October 31, 1981, and the related statements of income, stockholders' equity and changes in financial position for the years then ended. Our examinations were made in accordance with generally accepted auditing standards and, accordingly, included such tests of the accounting records and such other auditing procedures as we considered necessary in the circumstances.

In our opinion, the financial statements mentioned present fairly the financial position of MORECO Energy, Inc. at October 30, 1982 and October 31, 1981, and the results of its operations and changes in its financial position for the years then ended in conformity with generally accepted accounting principles applied on a consistent basis.

Seidman & Seidman

MORECO Energy, Inc.

BALANCE SHEETS

ASSETS	October 30, 1982	October 31, 1981
CURRENT:		
Cash (Note 3)	$ 504 134	$ 385 295
Commercial paper (at cost, which approximates market)	600 000	200 000
Accounts receivable, less allowance for possible losses of $100,000 and $50,000 (Note 3)	1 690 935	1 494 827
Inventories (Notes 1 and 3)	1 280 788	1 541 081
Other	11 827	113 254
TOTAL CURRENT ASSETS	4 087 684	3 734 457
PROPERTY AND EQUIPMENT (Note 3):		
Land, building and improvements	462 340	408 240
Machinery and equipment	4 064 470	3 572 994
Construction-in-progress	77 288	184 592
	4 604 098	4 165 826
Less accumulated depreciation	519 982	218 339
NET PROPERTY AND EQUIPMENT	4 084 116	3 947 487
OTHER ASSETS:		
Note receivable (Note 7)	-	50 000
Miscellaneous	14 997	89 930
	$8 186 797	$7 821 874

LIABILITIES AND STOCKHOLDERS' EQUITY	October 30, 1982	October 31, 1981
CURRENT LIABILITIES:		
Accounts payable	$ 881 480	$ 813 340
Accrued expenses and other current liabilities (Note 2)	573 448	705 808
Current maturities of long-term debt (Note 3)	47 500	35 300
TOTAL CURRENT LIABILITIES	1 502 428	1 554 448
LONG-TERM DEBT, less current maturities (Note 3)	5 379 615	5 405 900
DEFERRED INCOME TAXES (Note 9)	330 000	180 000
TOTAL LIABILITIES	7 212 043	7 140 348
COMMITMENTS AND CONTINGENCIES (Notes 4 and 8)		
STOCKHOLDERS' EQUITY (Note 3):		
Common stock, $.01 par - shares authorized 10,000,000; outstanding 2,100,000	21 000	21 000
Additional paid-in capital	276 440	276 440
Retained earnings	677 314	384 086
TOTAL STOCKHOLDERS' EQUITY	974 754	681 526
	$8 186 797	$7 821 874

See accompanying summary of accounting policies and notes to financial statements.

MORECO Energy, Inc.

STATEMENTS OF INCOME

	Year ended	
	October 30, 1982	October 31, 1981
REVENUE:		
Net sales (Note 5)	$ 16 229 769	$ 14 534 439
Other	172 057	190 066
Total revenue	16 401 826	14 724 505
COSTS AND EXPENSES:		
Cost of sales	13 320 464	11 371 332
Selling expenses	417 135	249 122
General and administrative expenses	806 991	749 163
Total costs and expenses	14 544 590	12 369 617
OPERATING INCOME	1 857 236	2 354 888
Interest expense, principally on acquisition debt	(999 511)	(1 089 753)
Income before nonrecurring expenses and income taxes	857 725	1 265 135
NONRECURRING EXPENSES:		
Costs of unsuccessful offering (Note 6)	367 497	-
Costs of unsuccessful merger (Note 7)	-	564 049
	367 497	564 049
Income before income taxes	490 228	701 086
INCOME TAXES (Note 9)	197 000	317 000
NET INCOME	$ 293 228	$ 384 086

See accompanying summary of accounting policies and notes to financial statements.

MORECO Energy, Inc.

STATEMENTS OF STOCKHOLDERS' EQUITY

	Common stock		Additional paid-in capital	Retained earnings
	Shares	Amount		
BALANCE, October 25, 1980	1 977 060	$19 771	$260 256	$ -
Net income for the year	-	-	-	384 086
Sale of common stock	61 777	617	8 133	-
Shares issued in connection with unsuccessful merger (Note 7)	61 163	612	8 051	-
BALANCE, October 31, 1981	2 100 000	21 000	276 440	384 086
Net income for the year	-	-	-	293 228
BALANCE, October 30, 1982	2 100 000	$21 000	$276 440	$677 314

See accompanying summary of accounting policies and notes to financial statements.

MORECO Energy, Inc.

STATEMENTS OF CHANGES IN FINANCIAL POSITION

	Year ended October 30, 1982	Year ended October 31, 1981
SOURCE OF WORKING CAPITAL:		
Net income	$ 293 228	$ 384 086
Add items not requiring working capital:		
Depreciation	306 061	232 903
Deferred taxes	174 000	208 000
Write-off of capitalized offering costs and note receivable	122 000	-
Total derived from operations	895 289	824 989
Proceeds from sale of common stock	-	17 413
Increase in long-term debt	37 111	176 673
Total	932 400	1 019 075
USE OF WORKING CAPITAL:		
Additions to property and equipment	442 690	596 197
Increase in note receivable	-	50 000
Increase in other assets	21 067	91 818
Payment and current maturities of long-term debt	63 396	20 773
Total	527 153	758 788
INCREASE IN WORKING CAPITAL	$ 405 247	$ 260 287
CHANGES IN WORKING CAPITAL ITEMS:		
Increase (decrease) in current assets:		
Cash and commercial paper	$ 518 839	$ 202 405
Accounts receivable	196 108	281 271
Due from subsidiary of Esmark, Inc.	-	(147 000)
Inventories	(260 293)	746 522
Other	(101 427)	79 384
Total	353 227	1 162 582
Decrease (increase) in current liabilities:		
Accounts payable	(68 140)	(386 639)
Accrued expenses	132 360	(480 356)
Current maturities of long-term debt	(12 200)	(35 300)
Total	52 020	(902 295)
INCREASE IN WORKING CAPITAL	$ 405 247	$ 260 287

See accompanying summary of accounting policies and notes to financial statements.

MORECO Energy, Inc.

SUMMARY OF ACCOUNTING POLICIES

BUSINESS

The Company owns and operates a lubricant re-refining facility, in which waste oils are re-refined and blended with virgin base oils and additives to produce lubricant products.

BASIS OF FINANCIAL STATEMENT PRESENTATION

Effective October 25, 1980, Motor Oil Refining Holding Company acquired all of the outstanding stock of Motor Oils Refining Company from a subsidiary of Esmark, Inc. for cash of $5,500,000. The transaction was consumated on November 25, 1980 and has been accounted for under the purchase method of accounting. The acquisition resulted in costs in excess of underlying equity in net assets at the date of acquisition, which were allocated to the acquired assets and assumed liabilities based on their respective fair values. The principal result of the allocation was an increase of $1,364,750 from the historical book value of the acquired property and equipment. The remaining useful lives of the acquired property and equipment were extended to 15 years.

In September, 1981, Motor Oil Refining Holding Company merged into its subsidiary, Motor Oils Refining Company. The merger was effected by Motor Oils Refining Company issuing 1,977,060 shares of $.01 par value common stock to the stockholders of the parent company in exchange for their 280,027 shares of $1 par value stock. The name of the surviving company was changed to MORECO Energy, Inc. The financial statements have been retroactively adjusted to reflect the acquisition of Motor Oils Refining Company and the merger transactions as if they had occurred on October 25, 1980.

FISCAL YEAR

The Company maintains its accounting year on a 52 to 53 week year ending on the last Saturday in the month of October.

MORECO Energy, Inc.

SUMMARY OF ACCOUNTING POLICIES
(Concluded)

INVENTORIES

Inventories are valued at the lower of cost or market, using the first-in, first-out (FIFO) method.

PROPERTY, EQUIPMENT AND DEPRECIATION

Property and equipment are stated at cost and depreciated over their estimated useful lives (15 years) by the straight-line method for financial reporting purposes.

INCOME TAXES

Investment tax credits are accounted for as a reduction of income taxes in the year utilized.

PENSION PLAN

During 1982, the Company adopted a noncontributory defined benefit pension plan for union employees. The Company's policy is to amortize prior service costs over 10 years and to fund pension costs accrued.

MORECO Energy, Inc.

NOTES TO FINANCIAL STATEMENTS

NOTE 1 - INVENTORIES

Inventories consist of:

	October 30, 1982	October 31, 1981
Finished products and work-in-process	$ 499 949	$ 387 968
Raw materials	622 294	1 015 711
Supplies	158 545	137 402
Total	$1 280 788	$1 541 081

NOTE 2 - ACCRUED EXPENSES AND OTHER CURRENT LIABILITIES

Accrued expenses and other current liabilities consist of:

	October 30, 1982	October 31, 1981
Salaries, commissions and employee benefits	$217 999	$153 622
Professional fees	100 000	163 000
Interest	150 869	213 662
Income taxes	38 000	83 000
Taxes, other than income taxes	47 580	50 546
Drum deposits and other	19 000	41 978
Total	$573 448	$705 808

MORECO Energy, Inc.

NOTES TO FINANCIAL STATEMENTS
(Continued)

NOTE 3 - LONG-TERM DEBT

Long-term debt consists of:

	October 30, 1982	October 31, 1981
Notes payable to banks (a)	$4 500 000	$4 500 000
Subordinated debentures payable to stockholders (b)	750 000	750 000
Obligations under capitalized equipment leases, payable monthly through 1987	177 115	191 200
	5 427 115	5 441 200
Less current maturities	47 500	35 300
Total long-term debt	$5 379 615	$5 405 900

(a) Under a loan agreement with two banks, the Company borrowed $4,500,000 to partially finance the acquisition of Motor Oils Refining Company. The agreement, which was amended as of November, 1982, provides for a revolving credit arrangement for two years with repayment of the loans in 16 equal quarterly installments of $281,250 beginning in February, 1985. Interest on the unpaid balance is payable quarterly, at 1-1/2% above the prime rate during the revolver period and 1-3/4% above the prime rate during the term loan period. The notes are collateralized by accounts receivable, inventories, property and equipment and are personally guaranteed up to $2,000,000 by several stockholders. The agreement, among other matters, imposes restrictions on the redemption of common stock, capital expenditures and additional borrowings, and requires maintenance of a minimum net worth, working capital and a specified current ratio. The restrictions are such that they do not permit the payment of dividends. The agreement also provides for the Company to maintain compensating balances of 5% of the outstanding loan.

(b) The subordinated debentures, which were amended concurrently with the loan agreement with the two banks, are repayable in 16 equal quarterly installments of $46,875 beginning in February, 1985, plus interest on the unpaid balance, which is payable quarterly, at 1-1/2% above the prime rate. The proceeds from the debentures were used as additional financing for the acquisition of Motor Oils Refining Company. The debentures are subordinated to the notes payable to banks.

MORECO Energy, Inc.

NOTES TO FINANCIAL STATEMENTS
(Continued)

At October 30, 1982, long-term debt maturities in each of the next five years are as follows:

1983 - $ 47 500
1984 - $ 47 500
1985 - $1 031 900
1986 - $1 345 300
1987 - $1 314 500

NOTE 4 - LEASE COMMITMENTS

Rent expense charged to operations amounted to approximately $243,200 and $164,500 for 1982 and 1981, respectively.

At October 30, 1982, future minimum rentals on noncancelable operating leases are as follows:

	Rail cars	Premises	Total
1983	$115 200	$ 58 100	$173 300
1984	86 600	58 100	144 700
1985	57 900	58 100	116 000
1986	19 200	58 100	77 300
1987	1 700	20 800	22 500
Later years	1 600	2 100	3 700
Total	$282 200	$255 300	$537 500

NOTE 5 - SALES TO MAJOR CUSTOMERS

Sales to one customer accounted for approximately 22% of net sales in 1982 and sales to a different customer accounted for approximately 10% of net sales in 1981.

MORECO Energy, Inc.

NOTES TO FINANCIAL STATEMENTS
(Continued)

NOTE 6 - UNSUCCESSFUL OFFERING

During 1982, the Company abandoned plans for a public offering of its common stock. Expenses incurred in connection with the unsuccessful offering have been reflected in the accompanying statement of income as "Nonrecurring Expenses - Costs of Unsuccessful Offering".

NOTE 7 - UNSUCCESSFUL MERGER

In June, 1981, the Company terminated an agreement to merge with a publicly held company. In accordance with the settlement, the Company, among other matters, issued 61,163 shares of its common stock, made a loan of $50,000 to be collateralized by part of the above stock and agreed to pay certain expenses relating to the proposed merger.

Expenses incurred in connection with the unsuccessful merger have been reflected in the accompanying statement of income as "Nonrecurring Expenses - Costs of Unsuccessful Merger".

NOTE 8 - PENSION PLAN

The Company's contribution to the pension plan, which is actuarially determined, amounted to $10,440 in 1982 which is approximately the amount of the actuarial present value of nonvested accumulated plan benefits. The assumed rate of return used in determining the actuarial present value of accumulated plan benefits is 6%.

MORECO Energy, Inc.

NOTES TO FINANCIAL STATEMENTS
(Concluded)

NOTE 9 - INCOME TAXES

Income taxes consist of the following:

	October 30, 1982	October 31, 1981
Current:		
Federal	$ 65 000	$136 000
Less investment and other tax credits	55 000	53 000
	10 000	83 000
State	13 000	26 000
	23 000	109 000
Deferred:		
Federal	150 000	180 000
State	24 000	28 000
	174 000	208 000
Total	$197 000	$317 000

Deferred income taxes represent timing differences resulting primarily from the use of accelerated depreciation for income tax purposes and straight-line depreciation for financial reporting purposes.

The effective tax rate on income before income taxes was less than the federal statutory tax rate for the above years primarily due to the utilization of investment and other tax credits.

The Company has net operating loss carryforwards of approximately $1,400,000 available to offset future state taxable income. As future tax benefits related to these carryforwards are realized, property and equipment will be reduced in accordance with the provisions of Accounting Principles Board Opinion No. 16.

* * * * *

Certificate of Insurance

Date: 25 May 83
Revision No.: 0
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I-8 Certificate of Insurance

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO
THIS CERTIFICATE DOES NOT AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED B

NAME AND ADDRESS OF AGENCY

ZUBER INSURANCE AGENCY
4615 SOUTHWEST FREEWAY
HOUSTON, TEXAS 77027
PHONE: 713-623-2451

COMPANIES AFFORD... COVERAGE

COMPANY LETTER A National Union Fire
COMPANY LETTER B
COMPANY LETTER C
COMPANY LETTER D
COMPANY LETTER E

NAME AND ADDRESS OF INSURED

Motor Oils Refining Co. and
Amber Oil Company
4803 Harlem
Forrest View, Illinois 50402

This is to certify that policies of insurance listed below have been issued to the insured named above and are in force at this time. Notwithstanding any requirement, term or condition of any contract or other document with respect to which this certificate may be issued or may pertain, the insurance afforded by the policies described herein is subject to all the terms, exclusions and conditions of such policies.

COMPANY LETTER	TYPE OF INSURANCE	POLICY NUMBER	POLICY EXPIRATION DATE	Limits of Liability in Thousands (000)	EACH OCCURRENCE	AGGREGATE
A	GENERAL LIABILITY [X] COMPREHENSIVE FORM [X] PREMISES—OPERATIONS [ ] EXPLOSION AND COLLAPSE HAZARD [ ] UNDERGROUND HAZARD [X] PRODUCTS/COMPLETED OPERATIONS HAZARD [X] CONTRACTUAL INSURANCE [ ] BROAD FORM PROPERTY DAMAGE [X] INDEPENDENT CONTRACTORS [X] PERSONAL INJURY	TBD	10-26-83	BODILY INJURY	$	$
				PROPERTY DAMAGE	$	$
				BODILY INJURY AND PROPERTY DAMAGE COMBINED	$ 500	$ 500
				PERSONAL INJURY		$
A	AUTOMOBILE LIABILITY [X] COMPREHENSIVE FORM [ ] OWNED [ ] HIRED [ ] NON-OWNED	TBD	10-26-83	BODILY INJURY (EACH PERSON)	$	
				BODILY INJURY (EACH ACCIDENT)	$	
				PROPERTY DAMAGE	$	
				BODILY INJURY AND PROPERTY DAMAGE COMBINED	$ 500	
A	EXCESS LIABILITY [X] UMBRELLA FORM [ ] OTHER THAN UMBRELLA FORM	TBD	10-26-83	BODILY INJURY AND PROPERTY DAMAGE COMBINED	$5,000	$
A	WORKERS' COMPENSATION and EMPLOYERS' LIABILITY	TBD	10-26-83	STATUTORY		
					$ 100	(EACH ACCIDENT)
A	OTHER Automobile Physical Damage	TBD	10-26-83	Comprehensive - $100 Ded cars Collision - $250 Ded Fire, Theft, CAC on trucks		

DESCRIPTION OF OPERATIONS/LOCATIONS/VEHICLES

Cancellation: Should any of the above described policies be cancelled before the expiration date thereof, the issuing company will endeavor to mail 10 days written notice to the below named certificate holder, but failure to mail such notice shall impose no obligation or liability of any kind upon the company.

NAME AND ADDRESS OF CERTIFICATE HOLDER:

Commonwealth Edison
P.O. Box 767
Chicago, Illinois 60690

DATE ISSUED: January 4, 1983

Zuber Insurance Agency, Inc.
AUTHORIZED REPRESENTATIVE

ACORD 25 (1-79)

SUBMITTED BY: _____

PRODUCER: _____

ADDRESS: _____

_____ ZIP _____

SURPLUS LINES LICENSE NO.: _____

UNDERWRITING MANAGER

SHAND, MORAHAN & COMPANY, INC.
ONE AMERICAN PLAZA
EVANSTON, ILLINOIS 60201
Telex: 72 4238 Phone: (312) 866-2800

866-2800

APPLICATON FOR ENVIRONMENTAL IMPAIRMENT LIABILITY INSURANCE (CLAIMS MADE BASIS)

APPLICANT'S INSTRUCTIONS:

1. Answer all questions. If the answer to any question is NONE, please state NONE.
2. Application must be signed and dated by owner, partner or officer.
3. Complete a separate application for each site, facility or operation.
4. PLEASE READ CAREFULLY THE STATEMENTS AT THE END OF THIS APPLICATION.

(PLEASE TYPE OR PRINT)

1. APPLICANT

a. Full name of all entities to be Named Insureds: MORECO Energy, Inc., Motor Oils Refining Co., Amber Oil Co., ABC Oil Service, Pierce Waste Oil, Industrial Fuel Co, Central Refining Co., & Tri-State Oil.

b. Principal address: 7601 W. 47th Street, McCook, Illinois 60525

c. Location of site or facility: Same as "b"

d. Business conducted: Oil Re-refining

e. Corporation ☒ Partnership ☐ Proprietorship ☐ Other ☐ _____

f. Years in business at this location: Since 1940

g. Prior experience in this business: Since 1934

h. Present affiliation with other firms: None

WASTE STORAGE AND TREATMENT FACILITIES complete sections 2 through 8.

WASTE GENERATORS complete sections 3, 4, 6, 7, 9.

WASTE TRANSPORTERS complete sections 6, 7, 10 (& 3 if applicable).

2. A SITE OR FACILITY

a. Describe the ultimate waste disposal methods utilized. ☐ Landfill ☐ Incineration ☒ Other Treatment

Describe: There is no landfilling on this site. The facility is a recycling facility. Product brought into it can have elements which in themselves would be considered hazardous. All elements go out in a finished product.

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b. If any waste materials are temporarily stored on-site for more than 24 hours before ultimate disposal, please describe the wastes that might be so stored (chemical names, loose piles, etc.) and the longest estimated period of time the wastes might be stored before ultimate disposal.

Types of Waste that might be stored	Nature of Storage	Estimated longest storage period
Metal Elements in Lube Oil	Liquid Bulk Storage	30 Days

c. Describe for each applicable disposal category, the capacity and life expectancy of the facility.

Disposal Category	Capacity	Estimated Life Remaining (years)
Landfill		
Area: used acres		
remaining acres		
Daily Handling Capacity: (Specify as tons, cubic yards drums, etc.)		
Incineration		
Daily Handling Capacity:	tons	
Other		
Daily Handling Capacity: (Specify units)	60-70,000 Gallons	indefinite

d. Describe for applicable disposal category, how the release or migration of hazardous wastes from the facility is controlled. Landfill: (Example: Plastic liner barrier keeps leachate within landfill) Entire plant has a dike to control spills.

Incineration: (Example: Facility is especially designed for high temperature operation to burn hazardous wastes.)

Other:

e. To the best of your knowledge, were there any prior activities at this location which might increase the probability of release or migration of hazardous wastes from the facility? Yes ☐ No ☒. If yes, describe:

f. Do you have a preventive maintenance program? Yes ☒ No ☐. If yes, please attach copy or describe: It works with our OSHA & operating permit program - consists of testing equipment and inspecting tankage.

g. Does the disposal facility have official approval by an agency of government? Yes ☒ No ☐. If yes, describe the form of approval (EPA hazardous Waste Disposal permit, local permit to operate, etc.) Federal EPA permit, State operating permit (Illinois).

3. PROTECTION OF FACILITY OR TERMINAL

a. Describe how access to this location is controlled. Entire facility is fenced. Access is by one gate in the front of the plant for vehicles and a gate in the rear for railcars.

b. Describe any systems and/or equipment currently used to monitor the release or migration of hazardous wastes from the facility. Only monitor is waste water treatment, but does not test for hazardous wastes.

c. Is the location subject to periodic flooding or other weather phenomena which might result in damage to the facility or removal of material from the site? No

a. Check the one that most adequately describes the area in which you are located: Industrial ☒ Commercial ☐ Residential ☐ Rural Agricultural ☐ Other ☐ Describe: _____

b. Describe immediate adjacent properties: Side (East) park, South-railroad, West - paint plant, North - Bowling alley.

c. State the horizontal distance to the nearest surface water: 1,000 feet

State vertical distance to the water table: 30 feet

d. Identify persons, other than employees, who regularly enter or have duties at this location: N/A

5. WASTE TYPES

a. Describe in detail the types of waste currently accepted at this facility (chemical names, if known, or other identification), their method of containment, and estimated quantities for the coming year.

Type of Waste (Chemical name, if known)	Containment Method (Drums, loosebulk, etc.)	Estimated Quantities for year (tons, cubic yards, drums, etc. Specify)
Used Oils	Drums & Tanks	16 million gallons

b. If waste material from prior activities remain at this site, please describe them (chemical names, if known, or other identification), how they are presently contained (drums on surface, drums buried in landfill, loose solids on surface, etc.), and their estimated quantities.

Type of Waste	Present Containment	Total Estimated Quantities (specify units)
N/A		

c. List five major customers and their waste: Burlington Northern Railroad - used oils; Santa Fe Railroad - used oils; Conrail - used oils; Milwaukee Road Railroad - used oils; Chicago Northwestern Railroad - used oils.

d. Describe types of waste not accepted at this location: All others.

6. AIM HISTORY

a. Individual losses including deductibles and/or defense costs:

Date of Claim	Describe Impairment and Injury or Damage	Amount Paid and Reserved	Date Evaluated
N/A			

Are you aware of any other incidents or conditions which may result in claims against you? Yes ☐ No ☒. If yes, give details: _____

Have you ever been accused or prosecuted for failure to comply with any federal, state or local statute or regulation relating to the protection of the environment? Yes ☐ No ☒. If yes, please describe: _____

d. Are you presently in compliance with all statutes and regulations? Yes ☒ No ☐. If yes, please describe: We have all permits required for operation of our refinery.

7. LOSS PREVENTION & CONTROL

a. Designate the person(s) responsible for environmental protection:

i) at this site or facility: Thomas A. Hrastich - Plant Operations Manager

ii) Corporate official: Kenneth L. Fredette - Vice President of Finance

b. Is there a written plan to minimize damage in the event an incident takes place? Yes ☐ No ☒. If yes, please attach copy:

c. Is there a written procedure for obtaining information concerning complaints from workers or other persons? Yes ☐ No ☒. If yes, please attach.

d. Is a formal health and safety program conducted for employees? Yes ☐ No ☐. If yes, please describe: Hafe Safety Committee, safety awards, monthly slogan contests, monthly meetings.

8. OTHER CONSIDERATIONS

a. State number of persons employed at this location and the annual payroll: 52 employees - $1,237,171.71

b. State the projected annual income and/or budget for this location: $436,000

c. State your current Workers Compensation experience modification: Frequency rate - 2.93; Severity rate - 2.93; Incidence rate - 17.56

9. GENERATORS

a. Describe the operations and/or processes which produce solid or liquid wastes that require landfilling, permanent container storage, incineration, or some other bulk disposal method.

Operation/Process	Manufactured Product	Raw Materials
Refining Oil	Lubricating Oils	Oil

Identity Waste (chemical name, if known)	Waste Form (liquid, solid, sludge, etc.)	Quantity Per Year (tons, cubic yds., drums, etc.)
Oil (non-hazardous)	Sludge (clay filter cake)	5,200 tons
Oil (tank bottoms) - contains lead - hazardous	Liquid	20,000 gallons

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b. If any waste materials are temporarily stored on-site for more than 24 hours before ultimate disposal, please describe the wastes that might be so stored, the nature of storage, and the longest estimated period of time that wastes might be stored before ultimate disposal

Types of Waste that might be stored	Nature of Storage	Estimated longest storage period
Clay sludge - non-hazardous	Clay Box	2 Days

c. Describe the location of your waste disposal facilities. ☐ On manufacturing/processing Site ☒ Off-site

i) If, off-site, state whether disposal facility is operated by: ☐ Self ☒ Contractor.

ii) If, off-site, state whether transport to facility is performed by: ☐ Self ☒ Contractor.

d. If contractor hauls your waste to the disposal site please name: Browning-Ferris, Clearing Disposal

e. Was the location originally designed for its current usage? Yes ☒ No ☐. If no, please explain:

f. Does the facility have offical approval by an agency of government? Yes ☒ No ☐. If yes, describe the form of approval (EPA Hazardous Waste Disposal permit, local permit to operate, etc.). Federal and state operating permits.

10. TRANSPORTERS

a. Describe the wastes transported, means of transportation for each, method of containment during transport, and quantity of waste materials expected to be transported during the coming year.

Wastes Transported (Give chemical name, if known)	Transportation Means (Truck, barge, etc.)	Containment Method (drums, tank, etc.)	Estimated Quantity (tons, cubic yards, drums etc. Specify)
Used Oils	Truck	Tank	11,000,000 gallons
Used Oils	Railroad Tank Car	Tank	5,000,000 gallons

b. Describe occupancy of the areas through which each waste type is transported (i.e. towns, residential, rural, agricultural etc): Mainly industrial areas and main commercial thoroughfares.

c. Are vehicles used in transportation of waste used for other activities? Yes ☒ No ☐. If yes, please describe use: Delivery & pickup of drums of good oil and used oils.

d. Are waste materials ever temporarily stored at a facility under your ownership or management while awaiting transport to a disposal site? ☐ Occasionally ☐ Usually ☒ No. If occasionally or usually, complete part 3.

e. Does the disposal facility have offical approval by an agency of government? Yes ☒ No ☐. If yes, describe the form of approval (EPA Hazardous Waste Disposal permit, local permit to operate, etc.). State operating permit.

8. Do the waste transportation activities described in this application have formal approval by an agency of government? Yes ☐ No ☐. If yes, describe the form of approval (local permit to operate, etc.) _____

ATTACH A COPY OF THE FOLLOWING:

1. A map or sketch of this location and surrounding areas.
2. Applicant's last annual report or financial statement.
3. Other material describing your facilities and/or operations.

NOTICE TO APPLICANT: The coverage applied for is SOLELY AS STATED IN THE POLICY, which provides coverage on a "CLAIM MADE" basis for ONLY THOSE CLAIMS THAT ARE FIRST MADE AGAINST THE INSURED DURING THE POLICY PERIOD.

The undersigned authorized officer of the Applicant represents that to the best of his knowledge the statements herein are true, and it is agreed that this application shall be the basis of the contract and shall be deemed incorporated therein should the Insurer evidence its acceptance of this application by issuance of a policy. It is agreed that this application shall be on file with the Insurer, and that it shall be deemed to be attached to and made part of the policy, if issued, as if physically attached to the policy.

Shand, Morahan & Company, Inc., Underwriting Manager for the Insurer, is hereby authorized to make any investigation and inquiry in connection with this application as it deems necessary.

The Undersigned hereby authorizes the release of loss information from any prior insurer to Shand, Morahan & Company, Inc., Underwriting Manager for the Insurer.

Dated at _____ this _____ day of _____, 19____

MORECO Energy, Inc.
(Exact Corporate Name of Applicant)

By _____
(Signature and Title of Officer)*

*SIGNING OF THIS FORM DOES NOT BIND THE APPLICANT OR THE INSURER OR THE UNDERWRITING MANAGER TO COMPLETE THE INSURANCE. Application MUST be currently signed and dated to be considered for quotation.

ADDITIONAL EXPLANATION TO THE QUESTIONS DESIGNATED

Question #

SECTION J

OTHER FEDERAL LAWS

SECTION J
OTHER FEDERAL LAWS

Information will be provided in accordance with the requirements of 40 CFR Part 122.25 (a) (20) at the request of the EPA Region V office. At this time, however, we believe this facility is in compliance with the following Federal laws; Wild and Scenic Rivers Act, National Historic Preservation Act of 1966, Endangered Species Act, Coastal Zone Management Act, and the Fish and Wildlife Coordination Act.

SECTION K

CERTIFICATION

CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Date: May 31, 1983 Signature: _____
John P. O'Connell, President